<table>
<thead>
<tr>
<th>Food Allergens</th>
<th>Icon</th>
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</thead>
<tbody>
<tr>
<td>Fish</td>
<td>🐟</td>
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<tr>
<td>Peanut</td>
<td>🍗</td>
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<tr>
<td>Tree Nuts</td>
<td>🥣</td>
</tr>
<tr>
<td>Wheat</td>
<td>🌾</td>
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<tr>
<td>Crustaceans</td>
<td>🦀</td>
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<tr>
<td>Milk</td>
<td>🥛</td>
</tr>
<tr>
<td>Soy</td>
<td>🥨</td>
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<tr>
<td>Eggs</td>
<td>🥚</td>
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</table>

**Food Allergies for School Nutrition Managers and Staff**

**Instructor’s Manual**
Food Allergies for School Nutrition Managers and Staff

Instructor’s Manual

Time: 4 hours

PROJECT COORDINATOR
Liz Dixon, MS

EXECUTIVE DIRECTOR
Aleshia Hall-Campbell, PhD, MPH

Key Area: 2
Code: 2600 (Food Safety and HACCP)

2019
Institute of Child Nutrition

The University of Mississippi

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PURPOSE

Improve the operation of child nutrition programs through research, education and training, and information dissemination.

VISION

Lead the nation in providing research, education, and resources to promote excellence in child nutrition programs.

MISSION

Provide relevant research-based information and services that advance the continuous improvement of child nutrition programs.

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# Table of Contents

- Background Information ................................................................. 1
- Competencies, Knowledge, and Skills .................................................. 3
- Professional Standards ........................................................................ 3
- Training Objectives .............................................................................. 4
- Ground Rules ......................................................................................... 4
- Training-at-a-Glance ............................................................................ 5
- Preparation Checklist ........................................................................... 9
- Key Terms ............................................................................................. 11
- Introduction .......................................................................................... 13
- Lesson 1: All About Food Allergies ..................................................... 19
- Lesson 2: Reading Labels for Allergens ............................................... 35
- Lesson 3: Avoiding Cross-Contact ....................................................... 53
- Lesson 4: Accommodating Children with Food Allergies .................. 67
- Wrap-Up ............................................................................................... 79
- References ............................................................................................ 85
- Appendix
Background Information

Instructor’s Note: The purpose of the background information section is to help you become familiar with the context of the lesson. It is not a part of the lesson detail.

According to the Centers for Disease Control and Prevention (CDC) Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs, food allergies are a growing food safety and public health concern (2013). The Food Allergy Research & Education organization estimates that food allergies affect about 5.6 million children in the United States (n.d.). The CDC also estimates that 16%–18% of children with food allergies experience a reaction at school from accidentally eating food allergens. Sicherer et al. found that 25% of the severe and potentially life-threatening reactions (anaphylaxis) reported at schools happened in children with no previous food allergy diagnosis (2001).

Section 112 of the Food and Drug Administration (FDA) Food Safety Modernization Act (FSMA), Food Allergy and Anaphylaxis Management, provides guidance on voluntary food allergy and anaphylaxis management for schools and early childhood education programs (2018). The CDC published the Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs in 2013 to respond to FSMA expectations.

As explained in USDA’s Accommodating Children with Disabilities in the School Meals Programs – Guidance for School Food Service Professionals, school nutrition programs are required to have a school food safety program based on Hazard Analysis Critical Control Point (HACCP) principles to reduce or eliminate risks of food safety hazards; food allergens are considered a safety hazard (2017). The school food safety program applies to all settings in the school where food is stored, prepared, and served as part of USDA’s child nutrition programs, including the cafeteria, classrooms, and other settings.

According to the USDA’s guidance, any food allergy or food intolerance could be considered a disability (2017). Schools are required by Federal law to make a meal accommodation for a disability diagnosis made in writing by a state licensed healthcare professional.

Allergic reactions can be life threatening and have far-reaching effects on children and their families, as well as on the schools they attend. Staff in schools should follow plans for preventing an allergic reaction and responding to a food allergy emergency.

There are prompts for the instructor throughout the training to assist in teaching. Prompts are as follows:

SAY: What the instructor is to say to participants. This is the content that teaches the learning objectives.

ASK: This prompt is used when the instructor should ask the participants a question. If the question warrants feedback, it will be followed by the FEEDBACK prompt.

FEEDBACK: This prompt is used to ensure certain elements are covered in discussions, including possible answers for instructor to give.

DO: This prompt is used to explain what the instructor/participants are to do. It may be used to lead into activities, do demonstrations, show videos, or any other action the instructor would need to know to do.
SHOW SLIDE: This prompt is used for showing slides. Each slide has its own unique title. All content in the slide presentation is in the Instructor’s Manual using the “DO,” “ASK,” or “SAY” commands. Slides are not content heavy nor contain content that is not covered in the Instructor’s Manual in case the slide presentation is unable to be used.

PRE-/POST-ASSESSMENTS: This manual includes a pre-/post-assessment that will be administered at the beginning and at the end of the training.
Competencies, Knowledge, and Skills

**Competency 2.1:** Maintains sanitation, safety, and security practices in compliance with local, state, and Federal policies, procedures, and regulations.

**Competency 2.2:** Maintains sanitation, safety, and security practices to protect the health and well-being of students, customers, and employees.

**Source:** Institute of Child Nutrition. (2018). *Competencies, knowledge, and skills for school nutrition managers.* Retrieved from ICN website: https://theicn.org/icn-resources-a-z/ckssnmanagers21

Professional Standards

**FOOD SAFETY AND HACCP TRAINING – 2600**

Employee will be able to effectively utilize all food safety program guidelines and health department regulations to ensure optimal food safety.

2620 – Practice general food safety procedures.

2630 – Practice Federal, State, and local food safety regulations and guidance.

2640 – Promote a culture of food safety behaviors in the school community (includes training on food allergens).

**Key Area: 2**
Training Objectives

1. Evaluate the impact that an allergic reaction incident may have on a school.
2. Describe a food allergy, its symptoms, and treatment methods.
3. Identify the eight major food allergens.
4. Distinguish between food allergy and food intolerance.
5. Demonstrate how to find the eight major food allergens in the ingredient statement on the food label.
6. Describe how to find allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods.
7. Describe the procedures for reading ingredient statements.
8. Explain cross-contact.
9. Examine how cross-contact may occur, and develop strategies for preventing it.
11. Determine strategies to manage food prepared and served outside of the cafeteria.

Ground Rules

The following are ground rules and expectations for this training.

1. Show up on time and come prepared.
2. Stay mentally and physically present.
3. Let everyone participate.
4. Listen with an open mind.
5. Think before speaking.
6. Attack the problem not the person.
# Training-at-a-Glance

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Introduction</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Warm-Up</td>
<td>• Allergen picture printouts&lt;br&gt;• Chart paper&lt;br&gt;• Easel&lt;br&gt;• Painter’s Tape&lt;br&gt;• Markers&lt;br&gt;• Table tents&lt;br&gt;• Sticky notes&lt;br&gt;• Pen or pencil</td>
<td>15 minutes</td>
</tr>
<tr>
<td></td>
<td>Pre-Assessment</td>
<td>• Pre-Assessment&lt;br&gt;• Pen or pencil</td>
<td>10 minutes</td>
</tr>
<tr>
<td><strong>Lesson 1: All About Food Allergies</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evaluate the impact that an allergic reaction incident may have on a school.</td>
<td>The Power of a Story</td>
<td>• <em>Caitlin Remembered</em> video&lt;br&gt;• Laptop speakers&lt;br&gt;• Projector&lt;br&gt;• Reflection and Impact worksheet</td>
<td>20 minutes</td>
</tr>
<tr>
<td>Describe a food allergy, its symptoms, and treatment methods.</td>
<td>Epinephrine Auto-Injectors Demonstration</td>
<td>• Food Allergy Fact Sheet&lt;br&gt;• FARE Recognize and Respond to Anaphylaxis poster&lt;br&gt;• Sample auto-injectors&lt;br&gt;• FARE Food Allergy and Anaphylaxis Emergency Care Plan handout&lt;br&gt;• Food Allergy Emergency worksheet</td>
<td>30 minutes</td>
</tr>
<tr>
<td>Identify the eight major food allergens.</td>
<td></td>
<td>• Eight Major Allergens handout&lt;br&gt;• FARE Tips for Avoiding Your Allergen handout</td>
<td>5 minutes</td>
</tr>
<tr>
<td>Distinguish between food allergy and food intolerance.</td>
<td></td>
<td>• Food Allergies versus Food Intolerances handout&lt;br&gt;• Managing Food Allergies in Schools folder</td>
<td>5 minutes</td>
</tr>
<tr>
<td>Objective</td>
<td>Activity</td>
<td>Materials</td>
<td>Duration</td>
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<tr>
<td><strong>Lesson 2: Reading Labels for Allergens</strong></td>
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</tbody>
</table>
| Demonstrate how to find the eight major food allergens in the ingredient statement on the food label. | Hide and Seek Label Reading | • Reading Ingredient Statements for Food Allergens handout  
• FARE Tips for Avoiding Your Allergen handout  
• Hide and Seek Label Reading worksheet  
• Ingredient statement printouts  
• Painter’s tape | 25 minutes |
| Describe how to find allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods. | | • Tips for Recognizing Food Allergies in Bulk Items and USDA Foods handout | 10 minutes |
| Describe the procedures for reading ingredient statements. | Reading Food Labels  
Label Reading Role Playing | • Reading Food Labels worksheet  
• Tips for Managing Food Labels handout  
• Label Reading Role Playing cards (see Appendix)  
• Chart Paper  
• Markers | 35 minutes |
| **Lesson 3: Avoiding Cross-Contact** | | | |
| Explain cross-contact. | | | 5 minutes |
| Examine how cross-contact may occur, and develop strategies for preventing it. | Where are the Allergens?  
Avoiding Cross-Contact Plan  
Avoiding Cross-Contact Scenario | • Glo-germ®  
• 2 spatulas  
• Black light  
• Cleaning and Sanitizing Fact Sheet  
• Methods for Avoiding Cross-Contact handout  
• Avoiding Cross-Contact Plan worksheet  
• Avoiding Cross-Contact Scenario Cards | 40 minutes |
### Lesson 4: Accommodating Children with Food Allergies

<table>
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<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
</table>
| Describe methods for supporting children with food allergies. | • Laws Related to Disabilities and Privacy handout  
• Role of the School Nutrition Staff in Food Allergy Management handout | 10 minutes |
| Determine strategies to manage food prepared and served outside of the cafeteria. | Reduce the Risk | • Reduce the Risk worksheet  
• Chart paper  
• Markers | 15 minutes |

### Wrap-Up

| | Make It Stick | • Participant’s Workbook  
• Pen or pencil  
• Food Allergy Resources handout  
• Manager’s Corner: Food Allergies | 5 minutes |
| Post-Assessment | • Post-Assessment  
• Course Evaluations  
• Certificates | 10 minutes |

**Total time: 4 hours (240 minutes)**
## Preparation Checklist

**Instructions:** The following tasks are necessary for presenting this training. Assign each task to a specific person and determine the date that each task must be completed. Keep track of the progress by recording information on the tracking form and checking off tasks as they are completed. [Items may vary according to needs of particular lessons.]

<table>
<thead>
<tr>
<th>Task</th>
<th>Person Responsible</th>
<th>Completion Date</th>
</tr>
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<tbody>
<tr>
<td>Reserve equipment and gather supplies as needed for use on the day of class (6 weeks prior).</td>
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<td></td>
</tr>
</tbody>
</table>

**Host site provides:**
- Agenda
- Chart paper (self-adhesive strip)
- Certificates
- Easel
- Microphone (preferably wireless lapel/lavalier)
- Projector and screen
- Roster of participants
- Speakers

**Training provides:**
- Computer to present slides and/or DVD
- *Caitlin Remembered* video (download from www.theicn.org/foodsafety)
- Instructor’s Manual
- Timer
- Wireless presenter device and laser pointer

**ICN Toolkit (for trainings provided by ICN):**
- Participant’s Workbook (one per participant)
- Pre-/Post-Assessments and answers
- Evaluations
- Participants’ sign-in sheets
- FARE handouts (one of each for every participant)
  - *Recognize and Respond to Anaphylaxis* poster
  - *FARE Food Allergy and Anaphylaxis Emergency Care Plan* handout
### Tips for Avoiding Your Allergen handout

- Sample Epinephrine Auto-Injectors (1 of each brand)
- Painter’s tape (do not use masking tape)
- Pens, pencils, highlighters, self-adhesive notes, markers
- Name tags and table tents
- Black light
- Glo-germ® solution
- Two spatulas or other kitchen utensils

#### In Appendix

- Allergen picture printouts
- Ingredient statement printouts
- Label Reading Role Play Cards
- Avoiding Cross-Contact Scenarios
  - *Manager’s Corner: Food Allergies* (one per participant) found at www.theicn.org/foodsafety
  - *USDA’s Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals*

These three handouts will need to be downloaded and printed from www.foodallergy.org:

- **Recognize and Respond to Anaphylaxis poster**
- **Food Allergy & Anaphylaxis Emergency Care Plan handout**
- **Tips for Avoiding Your Allergen handout**
## Key Terms

<table>
<thead>
<tr>
<th>Key Terms</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>504 Plan</td>
<td>A written document that contains the services to be provided to a child with a disability, to comply with provisions in Section 504 of the Rehabilitation Act (1973)</td>
</tr>
<tr>
<td>Allergen</td>
<td>Usually harmless substance that can trigger an immune response in a person and cause an allergic reaction</td>
</tr>
<tr>
<td>Allergic Reaction</td>
<td>Immune system reacts abnormally to a usually harmless substance</td>
</tr>
<tr>
<td>Americans with Disabilities Act (1990) (ADA)</td>
<td>Prohibits discrimination and ensures equal opportunity for Americans with disabilities</td>
</tr>
<tr>
<td>Anaphylaxis</td>
<td>A severe allergic reaction with rapid onset that may cause difficulty breathing and death</td>
</tr>
<tr>
<td>Celiac Disease</td>
<td>An autoimmune disorder that affects the small intestine that is triggered by eating gluten and managed with a strict gluten-free diet</td>
</tr>
<tr>
<td>Cross-Contact</td>
<td>Occurs when an allergen is accidentally transferred from a food containing an allergen to a food or surface that does not contain an allergen</td>
</tr>
<tr>
<td>Cross-Contamination</td>
<td>Occurs when microorganisms from different sources contaminate food during preparation or storage</td>
</tr>
<tr>
<td>Epinephrine</td>
<td>Medicine (adrenaline) used to treat a serious allergic reaction</td>
</tr>
<tr>
<td>Family Educational Rights and Privacy Act (1974) (FERPA)</td>
<td>Federal program that protects the privacy of information entered into a student’s record</td>
</tr>
<tr>
<td>Food Allergen Labeling and Consumer Protection Act (FALCPA)</td>
<td>Labeling law that mandates labels of foods containing the eight major allergens and disclosure of the allergen in plain language</td>
</tr>
<tr>
<td>Food Allergy</td>
<td>An immune-mediated adverse reaction to a food protein that could cause a life threatening response</td>
</tr>
<tr>
<td>Food Allergy Management Plan</td>
<td>A school-wide plan designed to reduce the risk of exposure to food allergens and procedures for food allergy emergencies</td>
</tr>
<tr>
<td>Food Intolerance</td>
<td>An abnormal response to eating a certain food; not life threatening and does not involve the body’s immune system</td>
</tr>
<tr>
<td>Key Terms</td>
<td>Definition</td>
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<tr>
<td>Gluten</td>
<td>Protein found primarily in wheat, barley, and rye; can sometimes be found in oats from cross-pollination</td>
</tr>
<tr>
<td>Gluten Intolerance</td>
<td>A form of food intolerance that can cause digestive problems after eating gluten</td>
</tr>
<tr>
<td>Health Insurance Portability and Accountability Act (1996) (HIPAA)</td>
<td>Federal program that requires all medical records in any form to be kept confidential</td>
</tr>
<tr>
<td>Individualized Education Plan (IEP)</td>
<td>A written document that contains the program of special education provided to a child with a disability; to comply with provisions found in Part B of the Individuals with Disabilities Education Act 2006 (IDEA)</td>
</tr>
<tr>
<td>Individualized Healthcare Plan (IHP)</td>
<td>A written document that outlines the requirements of student healthcare services; developed by the school nurse</td>
</tr>
<tr>
<td>Individuals with Disabilities Education Act (IDEA) (1975, 2006)</td>
<td>Federal law that requires a free and appropriate public education be provided for children with disabilities</td>
</tr>
<tr>
<td>Lactose Intolerance</td>
<td>Food intolerance that causes digestive problems after eating or drinking lactose; individuals with lactose intolerance do not produce enough lactase enzymes in the small intestines</td>
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<tr>
<td>Phenylketonuria (PKU)</td>
<td>A rare condition in which a person cannot properly break down the amino acid phenylalanine</td>
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<tr>
<td>Rehabilitation Act of 1973</td>
<td>Federal law that prohibits discrimination against qualified persons with disabilities</td>
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<tr>
<td>State Licensed Healthcare Professional</td>
<td>Individual who is authorized to write medical prescriptions under state law; examples include doctor, nurse practitioner, or physician's assistant</td>
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## Introduction

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
</table>
|             | Warm-Up       | • Allergen picture printouts  
|             |               | • Chart paper  
|             |               | • Easel  
|             |               | • Painter’s Tape  
|             |               | • Markers  
|             |               | • Table tents  
|             |               | • Sticky notes  
|             |               | • Pen or pencil  | 15 minutes |
|             | Pre-Assessment| • Pre-Assessment  
|             |               | • Pen or pencil  | 10 minutes |
Introduction

SHOW SLIDE:  *Food Allergies for School Nutrition Managers and Staff*

SAY:  Welcome to the *Food Allergies for School Nutrition Managers and Staff* training. ICN partners with the United States Department of Agriculture’s (USDA), Food and Nutrition Service (FNS) to provide training opportunities for child nutrition professionals on current issues such as food allergies. Today you will learn about food allergies and how you can manage them in your schools.

SHOW SLIDE:  *Food Allergy Background*

SAY:  According to the Centers for Disease Control and Prevention’s (CDC) *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs*, food allergies are a growing food safety and public health concern (2013). The Food Allergy Research & Education organization estimates that food allergy affect about 5.6 million children in the United States, which is roughly 1 in 13 children (n.d.). Food allergies are fairly common, and the number of children diagnosed with food allergies is increasing. These guidelines report an 18% increase in the prevalence of food allergies in children from 1997–2007, but more recent data from 2011 found in *Trends in Allergic Conditions Among Children: United States, 1997–2011* by Jackson et al. indicates that this increase may be as high as 50% (2013).

Consequences of food allergies can be very serious. A fatal reaction can occur with even a trace amount of an allergen.

SHOW SLIDE:  *Logistics*

SAY:  Each of you has a Participant’s Workbook, which has valuable take-home resources and the activities we will be doing together.

We are hosted today by (insert name of organization that provided the room for training). The restrooms are located (describe where the restrooms are located), and the emergency exits are located (describe where the emergency exits are located). The training will last four (4) hours. If you have questions at any time, please write them on a sticky note and put them on the Bike Rack chart paper during the breaks.

DO:  Write “Bike Rack” on top of a piece of chart paper and put it on a far wall.

ASK:  Are there any questions I may answer for you at this time?

SAY:  Please fold your table tents in half and write your first name in large letters on one side.

ICN has developed the following Ground Rules to help this training run smoothly and allow all participants to benefit from the instruction and information.

- **Show up on time and come prepared.** Be prompt in arriving and in returning from breaks. Come with a positive attitude.
- **Stay mentally and physically present.** Be present and stay on task. Listen attentively to others and avoid disruptive side conversations.
• **Let everyone participate.** Be patient when listening to others speak. Treat all participants with the same respect that you would want from them.

• **Listen with an open mind.** Stay open to new ways of doing things, and listen for understanding. You can respect another person’s point of view without agreeing with them.

• **Think before speaking.** Seek first to understand, then to be understood.

SHOW SLIDE:  *Warm-Up Activity*

**DO: ACTIVITY: Warm-Up**

**Materials:**
- Chart paper
- Allergen picture printouts
- Painter’s tape
- Sticky notes
- Pens or pencils
- Easel

**Time:** 10 minutes (1 minute of individual work, 5 minutes of mingling, and 4 minutes of debrief)

**Instructions:** Tape the allergen pictures to a piece of chart paper with room underneath each. On three sticky notes, the participants will list three food allergies that students have in their school (one per sticky note). For about 5 minutes, participants will move around the room introducing themselves and share their food allergies with two other people. The participants will then place their sticky note under the designated allergen on the chart paper. The trainer will summarize the allergies posted.

**SAY:** Take three sticky notes and list one food allergy on each that students have in your school.

**DO:** Allow participants 1 minute to do this independently.

**SAY:** Now for about 2 minutes, take your sticky notes and move around the room to find someone you do not know or do not know well. Introduce yourself and share your allergens with this person, and then allow them to introduce themselves and share their list. When I cue you, you will move on to another person to share your name and list.

**DO:** Allow 5 minutes of group mingling.

**SAY:** When you are done, place your sticky notes under their respective allergen on the chart paper. Then, please return to your seats.

**DO:** Take about 4 minutes to summarize participants’ comments on the chart.

**Instructor’s Note:** You will refer back to this chart paper with the allergens in Lesson 2 when discussing the eight major allergens and allergens that are not the major eight.
SAY: We can see that our schools are indeed having to manage several types of food allergies.

SHOW SLIDE: *Topics for Today*

SAY: Today we will discuss food allergies (definitions, symptoms, and treatment), reading ingredient statements, safely preparing food for children with food allergies, and accommodating children with food allergies in your school. Our lessons today include:

1. All About Food Allergies
2. Reading Labels for Allergens
3. Avoiding Cross-Contact
4. Accommodating Children with Food Allergies

SHOW SLIDE: *Pre-Assessment*

DO: **ACTIVITY: Pre-Assessment**

Materials:
- Pre-Assessment
- Pen or pencil

Time: 10 minutes of individual work

Instructions: Pass the pre-assessment out to participants. Read the instructions for writing a four number identifier. Allow time for participants to take the pre-assessment, and then pick them back up.

SAY: I am going to pass out the pre-assessment. Please do not write your name on the assessment, instead write a four number identifier in the top right corner. Identifiers can be the last four (4) digits of your phone number, your child’s birthday, etc. Please remember what your identifier is to use on your post-assessment. Answer the questions to the best of your ability. We will go over the content during the training, and we will review the answers at the end. This activity should take about ten (10) minutes and is meant to be done individually.

**Instructor’s Note:** As a filler, encourage participants who have completed the pre-assessment (while waiting for others to finish) to review the list of key terms to familiarize themselves with some of the words and phrases that will be used during this training. They should also review the competencies, professional standards, and training objectives if time permits.
## Lesson 1: All About Food Allergies

<table>
<thead>
<tr>
<th>Objective</th>
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<tbody>
<tr>
<td>Evaluate the impact that an allergic reaction incident may have on a school.</td>
<td>The Power of a Story</td>
<td>• <em>Caitlin Remembered</em> video&lt;br&gt;• Laptop speakers&lt;br&gt;• Projector&lt;br&gt;• Reflection and Impact worksheet</td>
<td>20 minutes</td>
</tr>
<tr>
<td>Describe a food allergy, its symptoms, and treatment methods.</td>
<td>Epinephrine Auto-Injectors Demonstration&lt;br&gt;Food Emergency Questions</td>
<td>• Food Allergy Fact Sheet&lt;br&gt;• FARE Recognize and Respond to Anaphylaxis poster&lt;br&gt;• Sample auto-injectors&lt;br&gt;• FARE Food Allergy and Anaphylaxis Emergency Care Plan handout&lt;br&gt;• Food Allergy Emergency worksheet</td>
<td>30 minutes</td>
</tr>
<tr>
<td>Identify the eight major food allergens.</td>
<td></td>
<td>• Eight Major Allergens handout&lt;br&gt;• FARE Tips for Avoiding Your Allergen handout</td>
<td>5 minutes</td>
</tr>
<tr>
<td>Distinguish between food allergy and food intolerance.</td>
<td></td>
<td>• Food Allergies versus Food Intolerances handout&lt;br&gt;• Managing Food Allergies in School folder</td>
<td>5 minutes</td>
</tr>
</tbody>
</table>
Lesson 1: All About Food Allergies

SHOW SLIDE: Lesson 1: All About Food Allergies

SAY: The first lesson is learning “All About Food Allergies.” Our goals for this section are to learn about food allergies, identify the eight major food allergens, and understand the difference between food allergies and food intolerances.

To start, we are going to watch a video, Caitlin Remembered, about a student with a food allergy. This video was produced by the Center of Excellence for Food Safety Research in Child Nutrition Programs (2017). You do not need to take any notes, just give your full attention to the video.

OBJECTIVE: Evaluate the impact that an allergic reaction incident may have on a school.

SHOW SLIDE: Caitlin Remembered

DO: ACTIVITY: The Power of a Story

Materials:
- Caitlin Remembered video
- Laptop speakers
- Projector
- Reflection and Impact handout

Time: 20 minutes (8-minute video, 2 minutes individual reflection, 10 minutes class discussion)

Instructions: Play the Caitlin Remembered video. After the video, participants will take 2 minutes to write their thoughts on the Reflection and Impact worksheet. Have some participants share and discuss their thoughts about the video.

Instructor’s Note: This video is designed to be an impact video to reinforce the importance of having a food allergy management plan. Please make sure to reinforce at the end that this video is not real and that the people involved are actors.

Reflection and Impact

Instructions: Take one minute to reflect on the Caitlin Remembered video.

| FEEL | How do I feel from what I’ve just seen in the video? |
| THINK | What are the most important ideas I have heard from the group reflections? |
| DO | How can I use this reflection knowledge? What will I do differently in the future? |
DO: Show video.

SHOW SLIDE:  *The Power of a Story Activity*

SAY: I know this was a hard video to watch, and it has probably left you with some emotional feelings. Let us take some time to reflect on how we feel. Please turn in your workbook to the Reflection and Impact worksheet. Take a minute and reflect on how you felt after watching the video.

DO: Allow 2 minutes for participants to self-reflect and write.

ASK: Would anyone like to share how the video affected you?

DO: Allow 10 minutes for class discussion.

SAY: Please know that the video you just watched was a dramatization; no child actually died. Although this was staged, not following procedures for food allergies put into place can have real consequences. The children in our schools depend on us to keep their food safe.

**OBJECTIVE:** Describe a food allergy, its symptoms, and treatment methods.

SHOW SLIDE:  *What is a Food Allergy?*

SAY: Food Allergy Research and Education is the nation’s leading organization dedicated to food allergy research, education, advocacy, and awareness, and it’s the world’s largest private source of funding for food allergy research. They provide up to date food allergy resources at www.foodallergy.org. The direct links for the specific FARE resources are at the bottom of each handout.

On their web page, “*What is a Food Allergy?*”, a food allergy is defined as an immune-mediated adverse reaction to a food protein, which can cause a life-threatening response (n.d.). In allergic individuals, certain foods can trigger the immune system to develop an antibody against the allergen (food protein). Every time that person consumes that allergen, it can trigger a variety of allergic symptoms.

DO: Pass out the FARE Recognize and Respond to Anaphylaxis poster.

_Instructor’s Note:_ The FARE Recognize and Respond to Anaphylaxis poster is outside of this manual in the tool kit. The link is in the beginning of the Instructor’s Manual and on the website landing page for the training.

SAY: We are now going to discuss more about food allergies. Please follow along on the Food Allergy Fact Sheet in your Participant’s Workbook and on the FARE Recognize and Respond to Anaphylaxis poster.
Food Allergy Fact Sheet

What is a food allergy?
An immune-mediated adverse reaction to a food protein that could cause a life threatening response

What are the symptoms?
One or more symptoms can occur and can be MILD to SEVERE. According to Food Allergy Research and Education (FARE), symptoms may include:

• Hives (reddish, swollen, itchy areas on the skin)
• Eczema (a persistent dry, itchy rash)
• Itchy, red rash
• Repetitive coughing
• Hoarse voice
• Nausea & vomiting
• Diarrhea
• Abdominal cramping
• Swelling
• Stomach pain
• Nasal congestion or a runny nose
• Sneezing
• Slight, dry cough
• Odd taste in mouth
• Trouble swallowing
• Shortness of breath
• Turning blue
• Drop in blood pressure (feeling faint, confused, weak, passing out)
• Loss of consciousness
• Chest pain
• A weak or “thready” pulse
• Sense of “impending doom”

How might a child describe an allergic reaction?

• This food is too spicy.
• My tongue is hot (or burning).
• It feels like something is poking my tongue.
• My tongue (or mouth) is tingling.
• My tongue (or mouth) itches.
• My mouth feels funny.
• There is a frog in my throat.
• There’s something stuck in my throat.
• My lips feel tight.
• My throat feels thick.
• It feels like there is a bump on the back of my tongue.

What is anaphylaxis?
A severe allergic reaction with rapid onset that may cause difficulty breathing and death

What are the treatment methods?

• Epinephrine
• Antihistamine, if ordered by healthcare provider
• Inhaler (bronchodilator), if ordered by healthcare provider

How to avoid an allergic reaction?
Total avoidance of allergen food protein

SHOW SLIDE: **Allergic Symptoms**

**SAY:** As you can see on the FARE Recognize and Respond to Anaphylaxis poster, there are a variety of symptoms for food allergies (2015). One or more food allergic symptoms generally occur within minutes or up to two (2) hours after eating the food and can be mild to severe in nature. Occasionally an allergic reaction can occur after two (2) hours. More than one symptom often presents itself.

A mild symptom could be hives (a reddish, swollen, itchy area on the skin), nausea and vomiting, stomach pain, nasal congestion, or runny nose. A severe symptom could be swelling of the lips, tongue, or throat; shortness of breath; or a drop in blood pressure. We will review the treatment for severe symptoms in just a few minutes.

Not everyone is aware of the symptoms of food allergic reactions, and a delay in responding to the symptoms can be life threatening. Education and training to increase the awareness of food allergies with all members of the school community could prevent a tragedy.

Perhaps you have heard that an allergic reaction could occur from smelling or inhaling the food such as peanut dust. FARE explains that these conditions could occur but are rare (2014). The most common way for an allergic reaction to occur is by ingesting the food.

SHOW SLIDE: **How a Child Might Describe Symptoms**

**SAY:** FARE shares *How a Child Might Describe a Reaction* (2019). Remember, symptoms of a reaction can be mild to severe.

They might say something like:

- This food is too spicy.
- My tongue is hot (or burning).
- It feels like something is poking my tongue.
- My tongue (or mouth) is tingling (or burning).
- My tongue (or mouth) itches.
- It (my tongue) feels like there is hair on it.
- My mouth feels funny.
- There is a frog in my throat.
- There’s something stuck in my throat.
- My tongue feels full (or heavy).
- My lips feel tight.
- It feels like there are bugs in there. (to describe itchy ears)
- It (my throat) feels thick.
- It feels like a bump is on the back of my tongue (throat).

The person the child tells this information to will need to determine the next steps to care for the child. If you are the person the child is speaking to, you will have to decide what emergency actions to take.

SHOW SLIDE: **Anaphylaxis**
In Instructor's Manual | Food Allergies for School Nutrition Managers and Staff

SAY: The American Academy of Allergy Asthma and Immunology explains that anaphylaxis is a severe, possibly life-threatening allergic reaction known to be caused by food, insect venom, medications, and latex (n.d.). Anaphylaxis onset is rapid and may cause death. Anaphylaxis often involves difficulty breathing and may result in loss of consciousness or shock.

SHOW SLIDE: **Epinephrine**

SAY: In *Treating Severe Allergic Reaction*, FARE explains that the treatment for anaphylaxis is to administer a medication called epinephrine, which is also known as adrenaline (n.d.). An epinephrine auto-injector is a medical device used to deliver a measured dose (or doses) of epinephrine. Trade names for this device include EpiPen®, Adrenaclick®, and Auvi-Q® (Allerject® in Canada). There are also generic versions available.

DO: Show sample trainer epinephrine auto-injectors of various brands. Refer participants to the FARE Food Allergy and Anaphylaxis Emergency Care Plan handout.

Instructor’s Note: The FARE Food Allergy and Anaphylaxis Emergency Care Plan handout is outside of this manual in the tool kit. The link is in the beginning of the Instructor’s Manual and on the website landing page for the training.

SAY: The FARE Food Allergy and Anaphylaxis Emergency Care Plan handout shows how to use different types of epinephrine auto-injectors (2019). This is an epinephrine auto-injector trainer, note there are no medicine or needles in these. Each State and/or school has different policies for who can administer an epinephrine auto-injector during an allergy emergency and where the auto-injector should be stored. If you have any questions about your school’s food allergy plan, ask your director.

SHOW SLIDE: **FARE Resources**

SAY: Please get the FARE Recognize andRespond to Anaphylaxis poster. The poster provides a quick resource for what to do in a suspected allergic reaction.

SHOW SLIDE: **Food Allergy Management Plan**

SAY: Each school should have a food allergy management plan. The CDC’s *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs* recommends that each school develop a food allergy management plan with five (5) priority areas (2013).

1. Ensure the daily management of food allergies in individual children.
2. Prepare for food allergy emergencies.
3. Provide professional development on food allergies for staff members.
4. Educate children and family members about food allergies.
5. Create and maintain a healthy and safe educational environment.

Throughout these lessons, we will discuss different topics that should be in your school’s food allergy management plan and ask you questions about them. If you do not know the answers to some of the questions today, you can go back and discuss them with your director. Our first set of questions is about food allergy emergencies.

ASK: Have any of you had experience with administering epinephrine or seen someone respond to an allergic reaction? If so, would you care to share with the group?

DO: Allow participants to share stories.
SAY: Thank you for sharing.

SHOW SLIDE: *Food Allergy Emergency Activity*

DO: **ACTIVITY:** Food Allergy Emergency

Materials:
- Food Allergy Emergency worksheet

Time: 15 minutes

**Instructions:** In the following portion of the Instructor’s Manual, the trainer will ask several questions. Ask participants to follow along on the *Food Allergy Emergency* worksheet and write their answers as it pertains to their school in the “Answers” section. If they do not know the answer, tell them to check “Ask My Director.”

SAY: Please turn in your workbook to the *Food Allergy Emergency* worksheet. I will ask a series of questions as we discuss handling a food allergy emergency. In the “Answers” section, write some answers from your school’s food allergy management plan. If you do not know the answer, check “Ask My Director” to remind yourself to find out the answer when you get back to your school. Let’s look at the Emergency Reaction section.
# Food Allergy Emergency

**Instructions:** Answer the questions for your school’s food allergy management plan. If you do not know the answer, check “Ask My Director” to remind yourself to find out the answer when you get back to your school.

<table>
<thead>
<tr>
<th>Questions</th>
<th>Answers</th>
<th>Ask My Director</th>
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</thead>
<tbody>
<tr>
<td><strong>Emergency Reaction</strong></td>
<td></td>
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</tr>
<tr>
<td>A child has a reaction in the cafeteria, what do you do first? Who do you contact?</td>
<td></td>
<td></td>
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<tr>
<td>Who can administer epinephrine? Do you need to be trained to administer an auto-injector? Who is trained in your school?</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Epinephrine Auto-Injector</strong></td>
<td></td>
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<tr>
<td>What is the policy for a child with a known life-threatening food allergy for carrying an auto-injector?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the child’s auto-injector in the nurse’s office? Is the auto-injector available if the nurse is not in her/his office?</td>
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<td></td>
</tr>
<tr>
<td>What if the child is having a first-time allergic reaction and there is no prescription auto-injector available? Who do you contact?</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Responding to an Emergency</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is all staff trained on how to respond to an emergency? Do substitutes know how to respond? Part-time staff? Volunteers?</td>
<td></td>
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<tr>
<td>Do the phones near you get an outside line to call 911?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Will local EMS have epinephrine available for use when they arrive?</td>
<td></td>
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</tbody>
</table>
SHOW SLIDE:  *Emergency Reaction Questions*

ASK:

- A child has a reaction in the cafeteria, what do you do first? Who do you contact?
- Who can administer epinephrine? Do you need to be trained to administer an auto-injector? Who is trained in your school?

DO:  Do give participants a few minutes to write their responses. Ask a few volunteers to give their answers.

SHOW SLIDE:  *Response to Reaction*

SAY:  In the treatment of anaphylaxis with epinephrine, quick administration is key. A delay can be deadly. A serious food allergic reaction is an EMERGENCY. Call 911 or follow your school’s food allergy emergency policy. Do not hesitate when anaphylaxis is suspected. Notify the emergency medical service (EMS) that anaphylaxis is suspected so they will bring epinephrine. An expert panel held by the CDC revealed that state laws vary and not all EMS providers carry epinephrine. Let’s look at the next set of questions.

SHOW SLIDE:  *Auto-Injector Questions*

ASK:  For your school:

- What is the policy for a child with a known life-threatening food allergy carrying an auto-injector?
- Is the child’s auto-injector in the nurse’s office? Is the auto-injector available if the nurse is not in her/his office?
- What if the child is having a first time allergic reaction and there is no prescription auto-injector available? Who do you contact?

DO:  Do give participants a few minutes to write their responses. Ask a few volunteers to give their answers.

SHOW SLIDE:  *Epinephrine Auto-Injector*

SAY:  Know where epinephrine is available in your school. Typically, an auto-injector is only available by prescription for a particular person. Many states have written legislation to allow ‘stock’ auto-injectors so they will be available in a school in case they are needed. The medicine is intended to slow or reverse the symptoms of the allergic reaction, but children who receive an auto-injector will need follow-up care and observation. After epinephrine is used, call 911. The child should be transported in an emergency vehicle to the nearest hospital (CDC, 2013). Symptoms can improve or disappear, but a person may have a second reaction that could be worse than the first.

There are many questions about training staff about for allergies which we will now discuss.

SHOW SLIDE:  * Responding to an Emergency*
ASK:
- Is all staff trained on how to respond to an emergency? Do substitutes know how to respond? Part-time staff? Volunteers?
- Do the phones near you make an outside line to call 911?
- Will local EMS have epinephrine available for use when they arrive?

DO: Do give participants a few minutes to write their responses. Ask a few volunteers to give their answers.

SHOW SLIDE: Preparation is the Key to Success

SAY: These questions emphasize the need for being prepared.
- Be prepared to recognize the symptoms of an allergic reaction. Know who is authorized to administer medication and where it is stored.
- Be prepared to react in case of an allergic reaction emergency. Remember, quick administration of epinephrine is key. A delay can be deadly. Call 911 when a severe reaction is suspected.

All of these questions should be asked and answered before anyone has an allergic reaction in your school. If you have checked “Ask My Director” anywhere on the Food Allergy Emergency worksheet, make sure you follow up with your director.

OBJECTIVE: Identify the eight major food allergens.

SHOW SLIDE: The Eight Major Food Allergens

SAY: Please turn in your workbook to the Eight Major Allergens handout. There are eight (8) food allergens that account for 90% of all food allergic reactions in the United States:
1. Milk
2. Eggs
3. Peanuts
4. Tree nuts (e.g. walnuts, almonds, cashews, pistachios, and pecans)
5. Wheat
6. Soy
7. Fish
8. Crustacean shellfish (e.g. shrimp, lobster, and crab)

Be aware that oysters, mussels, and clams do not fall under crustacean shellfish, as they are in the mollusk family of shellfish. Consideration must be taken with allergies related to them, as they are not listed as one of the eight major allergens.
### Eight Major Allergens

<table>
<thead>
<tr>
<th>MILK</th>
<th>EGGS</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Milk Bottle" /></td>
<td><img src="image" alt="Eggs" /></td>
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</table>

<table>
<thead>
<tr>
<th>WHEAT</th>
<th>PEANUTS</th>
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</thead>
<tbody>
<tr>
<td><img src="image" alt="Wheat" /></td>
<td><img src="image" alt="Peanuts" /></td>
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<table>
<thead>
<tr>
<th>TREE NUTS</th>
<th>SOY</th>
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<tbody>
<tr>
<td>(e.g. walnuts, almonds, cashews, pistachios, and pecans)</td>
<td><img src="image" alt="Soy" /></td>
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</table>

<table>
<thead>
<tr>
<th>FISH</th>
<th>CRUSTACEAN SHELLFISH</th>
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<tbody>
<tr>
<td><img src="image" alt="Fish" /></td>
<td>(e.g. crab, lobster, and shrimp)</td>
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</tbody>
</table>

SHOW SLIDE: **Only Way to Prevent an Allergic Reaction**

**DO:** Pass out FARE Tips for Avoiding Your Allergen handout.

*Instructor’s Note:* The Tips for Avoiding Your Allergen handout is outside of this manual in the tool kit. The link is in the beginning of the Instructor’s Manual and on the website landing page for the training.

**SAY:** The FARE Tips for Avoiding Your Allergen handout shows common foods where the eight major allergens can be found (2019).

**ASK:** What are some food items on this handout that may contain one of the eight major allergens that you did not expect?

**FEEDBACK:**
- Milk – meatballs
- Eggs – mayonnaise
- Wheat – taco seasoning
- Peanuts – enchilada sauce
- Tree nuts – cereals
- Soy – hamburger
- Fish – Worcestershire sauce
- Shellfish – fish sticks (cross-contact)

**SAY:** There is no cure for food allergies. Total avoidance of a food allergen is the only way to prevent an allergic reaction. Next, we are going to differentiate between a food allergy and a food intolerance.

**OBJECTIVE:** Distinguish between food allergy and food intolerance.

SHOW SLIDE: **What is a Food Intolerance?**

**SAY:** Please turn to the Food Allergies and Food Intolerances handout in your workbook. This handout shows us the differences and similarities of food allergies and food intolerances which we are about to discuss.
A food intolerance is an abnormal response to a food that usually involves the gastrointestinal system but not the immune system. Eliminating the food will eliminate the symptoms. The treatment is determined by a state licensed healthcare professional and the patient. Common food intolerances that you might hear about are gluten, monosodium glutamate (MSG), and lactose (milk intolerance). Food intolerances do not cause immediate life-threatening reactions. Some children may be able to ingest some food related to their food intolerance, such as yogurt for a milk intolerance. For those with a milk allergy, they would not be able to consume any milk products.

A reaction to a food intolerance can be similar to, and is often confused with, a food allergic reaction. This is because they may have some similar symptoms such as nausea, diarrhea, and/or vomiting.

**ASK:** What food intolerances are you dealing with in your school?

**DO:** Allow time for participants to respond.
SHOW SLIDE: Celiac Disease

SAY: The Celiac Disease Foundation explains that celiac disease is unique; it is an autoimmune disorder that involves the small intestine (n.d.). The adverse reaction occurs when someone with celiac disease eats gluten, a protein found in wheat, barley, and rye. Oats, although they do not naturally contain gluten, can sometimes be unsafe due to cross-contact or cross-pollination. There is no cure for celiac disease, so a strict gluten-free diet is followed to manage the symptoms and promote intestinal health. Celiac disease can have significant long-term health effects if gluten is eaten.

ASK: Do you purchase and serve gluten-free products in your cafeteria?

DO: Allow time for participants to respond.

SAY: Careful label reading is needed to assure “Gluten-Free” products are purchased. Do not be confused by other terms used on labels: “Wheat-Free” does not mean “Gluten-Free” as gluten is in food products other than wheat. We will discuss more about reading labels in the next lesson.

DO: Refer participants to the Managing Food Allergies in Schools folder.

SAY: ICN provides the Managing Food Allergies in Schools folder for free (2017). It holds the Food Allergy Fact Sheets which are also available for free at www.theicn.org/foodsafety. There is a fact sheet for each of the eight major allergens. Each fact sheet provides common foods sources as well as possible substitutes for them.

SHOW SLIDE: Lesson 1 Review

SAY: We are now finished with the first lesson, All About Food Allergies. We have covered how to:

• Evaluate the impact that an allergic reaction incident may have on a school.
• Describe a food allergy, its symptoms, and treatment methods.
• Identify the eight major allergens.
• Distinguish between food allergy and food intolerance.

ASK: What questions do you have before we proceed?
# Lesson 2: Reading Labels for Allergens

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demonstrate how to find the eight major food allergens in the ingredient statement on the food label.</td>
<td>Hide and Seek Label Reading</td>
<td>• Reading Ingredient Statements for Food Allergens handout</td>
<td>25 minutes</td>
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<tr>
<td></td>
<td></td>
<td>• FARE Tips for Avoiding Your Allergen handout</td>
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<td></td>
<td></td>
<td>• Hide and Seek Label Reading worksheet</td>
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<td></td>
<td></td>
<td>• Ingredient statement printouts</td>
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<td>• Painter’s tape</td>
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<tr>
<td>Describe how to find allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods.</td>
<td></td>
<td>• Tips for Recognizing Food Allergies in Bulk Items and USDA Foods handout</td>
<td>10 minutes</td>
</tr>
<tr>
<td>Describe the procedures for reading ingredient statements.</td>
<td>Reading Food Labels Label Reading Role Play</td>
<td>• Reading Food Labels worksheet</td>
<td>35 minutes</td>
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<td></td>
<td>• Tips for Managing Food Labels handout</td>
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<tr>
<td></td>
<td></td>
<td>• Label Reading Role Playing cards</td>
<td></td>
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<td></td>
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<td>• Chart Paper</td>
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<td>• Markers</td>
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</tbody>
</table>
Lesson 2: Reading Food Labels for Allergens

SHOW SLIDE:  *Lesson 2: Reading Food Labels for Allergens*

SAY:  Now we will begin Lesson 2: Reading Food Labels for Allergens.

**OBJECTIVE:** Demonstrate how to find the eight major allergens in the ingredient statement on the food label.

SHOW SLIDE:  *Reading Ingredient Statements*

SAY:  Make food choices for children with food allergies after carefully reading the food label. Check every label, every time. Manufacturers are required to list the eight major food allergens on the label.

SHOW SLIDE:  *Food Allergen Labeling and Consumer Protection Act (FALCPA)*

SAY:  Please turn in your workbook to the *Reading Ingredient Statements for Food Allergens* handout. This handout provides information about the *Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA)* and how to find the eight major food allergens in an ingredient statement (2018).
Reading Ingredient Statements for Food Allergens

Food Allergen Labeling

The Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA) is a Federal law that became effective January 2006 (2018). It mandates that manufacturers identify any of the eight major food allergens in plain language on the food label.

<table>
<thead>
<tr>
<th>Eight Major Allergens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Egg</td>
</tr>
<tr>
<td>Fish</td>
</tr>
<tr>
<td>Peanuts</td>
</tr>
<tr>
<td>Milk</td>
</tr>
<tr>
<td>Crustacean Shellfish</td>
</tr>
<tr>
<td>Soy</td>
</tr>
<tr>
<td>Tree nuts</td>
</tr>
<tr>
<td>Wheat</td>
</tr>
</tbody>
</table>

There are specifics on where and how the information is to be presented. The food ingredient MUST be written in one of three ways.

1. Written as the **common or usual name** of the major food allergen
   - Example: “wheat flour”

2. In parenthesis following the ingredient that is not the common name
   - Example: “cream (milk)”

3. Listed after the ingredient statement in a “Contains” statement
   - Example: “Contains: wheat and soy”
Precautionary Labeling

Precautionary labeling is NOT covered in the Food Allergen Labeling and Consumer Protection Act, so it varies widely from manufacturer to manufacturer. Some common types of precautionary labeling are the “May Contain,” “Made on Equipment,” and “Processed in Facilities” statements. According to FARE, products labeled with precautionary labeling are not safe for people with known food allergies (How to Read Food Labels, n.d.).

“May Contain” statement
• Example: “May contain traces of peanuts”

“May Contain” statement
• Example: “Made on equipment that makes products containing eggs and tree nuts”

“Processed in Facilities” statement
• Example: “Processed in facilities that also process wheat”

Reading Ingredient Statements

Ingredient statements should be read when the product is received since suppliers may make product substitutions, formulas may change, or vendors could change. Check all labels carefully every time. Do not rely on specifications, fact sheets, or the last shipment. Read the label each time the product is received. Contact your director if you have any questions or are uncertain about the food item.

Holding Labels

It is recommended that labels of all products served be kept for 24 hours as a precaution so the label is available in case someone has an allergic reaction. Unlike a foodborne illness outbreak where the outbreak can occur days after a food is served, an allergic reaction will happen the day of service. If food is going to be served as leftovers or reused in another recipe, the label should be kept until all product is either consumed or disposed. Keeping a label library is a common practice; some keep the actual label, some schools scan the label.

Sources:

The Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA) is a Federal law that became effective January 2006 (2018). It mandates that manufacturers identify all of the eight major food allergens in plain language on the food label. There are specifics on where and how the information is to be presented. The food ingredient MUST be

1. Written as the **common or usual name** of the major food allergen
   - Example: “wheat flour”

2. In **parenthesis** following the ingredient that is not the common name
   - Example: “albumin (egg)”

3. Listed after the ingredient statement in a **“Contains” statement**
   - Example: “Contains: milk and wheat”

These pictures show the different methods of labeling. The one ingredient label uses the “Contains” statement, one states the common or usual name, and the final label uses the parenthesis method.

Precautionary labeling is NOT covered in the Food Allergen Labeling and Consumer Protection Act, so it varies widely from manufacturer to manufacturer.

Precautionary labeling may have wording such as “May Contain,” “Made on Equipment,” and “Processed in Facilities.” Examples for these statements could say:

- “Product may contain traces of tree nuts”
- “Made on equipment that is also used for products containing eggs and milk”
- “Processed in facilities that also process peanuts”

According to FARE, products labeled with precautionary labeling are not safe for children with known food allergies (*How to Read a Food Label*, n.d.).

**Materials:**
- FARE Tips for Avoiding Your Allergen handout
- Hide and Seek Label Reading worksheet
- Ingredient statement printouts
- Painter’s tape

**Time:** 5–8 minutes of group work. 10 minutes of class discussion.
**Instructions:** Divide participants into six (6) groups. Assign each group one of the labels on the wall. The groups will have 5 minutes to read the ingredient statement and determine the answer to the questions for that label on the *Hide and Seek Label Reading* worksheet. Participants can use the FARE Tips for Avoiding Your Allergen handout for help. After 5 minutes, have each group read out the answers for their label. Then have groups return to their seats and share observations about reading labels.

**SAY:** Please retrieve the FARE Tips for Avoiding Your Allergen handout. Now, please turn in your workbook to the *Hide and Seek Label Reading* worksheet. Six labels have been placed on the walls. I will divide you into six groups, and each group will be assigned one label. You will have 5 minutes to read the ingredient statements and answer the questions corresponding to your label on the *Hide and Seek Label Reading* worksheet. Use the FARE Tips for Avoiding Your Allergen handout that has been provided for you for assistance.

**DO:** Divide participants into six groups. Allow 5 minutes for participants to complete the activity and 10 minutes report back to the class.
## Hide and Seek Label Reading Answers

<table>
<thead>
<tr>
<th>QUESTIONS FOR LABEL C</th>
<th>ANSWERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Would you prepare and serve this product to a child with an egg allergy?</td>
<td>No, risk of cross-contact with eggs.</td>
</tr>
<tr>
<td>Does this statement meet the requirements of the labeling law?</td>
<td>No, it does not declare the allergen wheat correctly. Statement should be in “Contains”, in parenthesis, or in usual name.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>QUESTIONS FOR LABEL D</th>
<th>ANSWERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Can this product be served to a child with a known peanut allergy?</td>
<td>Yes, it is stated that it is made in a peanut and tree nut-free facility.</td>
</tr>
<tr>
<td>Can this product be served to a child with known egg, wheat, and soy allergies?</td>
<td>No, there is a risk of cross-contact with soy.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>QUESTIONS FOR LABEL E</th>
<th>ANSWERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>How many of the eight (8) major allergens are in this product? List the allergens.</td>
<td>4: soy, milk, fish, wheat</td>
</tr>
<tr>
<td>Can this product be served to a child with shellfish allergies?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>QUESTIONS FOR LABEL F</th>
<th>ANSWERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Which allergen is listed in the ingredient statement but is not listed in the “Contains” statement?</td>
<td>Soy</td>
</tr>
<tr>
<td>Would the missing information in the “Contains” statement be enough for the product to be recalled?</td>
<td>Yes, it is one of the major eight and is required to be declared.</td>
</tr>
</tbody>
</table>

### Label C
Ingredients: Durum flour & semolina blend, fiber, niacin, iron (ferrous sulfate), thiamin mononitrate, riboflavin, folic acid. Information: has wheat ingredients and is manufactured in a facility that uses eggs.

### Label D
Ingredients: Sunflower Seed, Sugar, Mono-Diglycerides to prevent separation, Salt, and Natural Mixed Tocopherols to preserve freshness. Made on equipment that processes soybeans. Processed in a peanut and tree nut free facility.

### Label E
**INGREDIENTS:** WATER, DISTILLED VINEGAR, VEGETABLE OIL (SOYBEAN AND/OR CANOLA), CIDER VINEGAR, ROMANO CHEESE (CULTURED MILK, SALT, ENZYMES), SUGAR, GARLIC*, EXTRA VIRGIN OLIVE OIL, CONTAINS LESS THAN 2% OF: OMEGA 3 [FISH OIL AND FISH GELATIN (CONTAINS TILAPIA, SARDINE, AND ANCHOVY)], ANCHOVY (FISH), LEMON JUICE CONCENTRATE, SPICE, SALT, FERMENTED WHEAT PROTEIN, YEAST EXTRACT, MALTODEXTRIN, XANTHAN GUM, PROPYLENE GLYCOL ALGINATE, POTASSIUM SORBATE, SODIUM BENZOATE AND CALCIUM DISODIUM EDTA AS PRESERVATIVES. *DRIED.

### Label F
Ingredients: BEEF, WATER, TEXTURED SOY PROTEIN, EGGS, DEHYDRATED ONION, GARLIC, SPICES, BREAD CRUMBS, WHEY ALLERGIES: CONTAINS EGGS, MILK, AND WHEAT.
ASK: What are some of your observations about reading labels for allergens?

FEEDBACK:
- The font on labels can be different.
- Some manufacturers use all caps and others do not.
- You have to carefully read the label.

SHOW SLIDE: **Recall Notifications**

SAY: Unfortunately, sometimes a food may be put onto the market with undeclared allergens. Recalls can be issued for food labels that do not declare one of the eight major allergens in a food. According to a recent article in Food Engineering Magazine, almost 42% of recalls (160 out of 382 recalls) in 2018 were due to undeclared allergens (2019). Food recalls due to undeclared allergens were higher than any other type of recall.

Food recalls are an important part of safety for food allergies. Coordinate with your director about how you should receive recall information. If you have a product that is being recalled, follow your school district’s policies on handling recalls. It is important to have a Standard Operating Procedure in place to help with recalls. A Standard Operating Procedure is a set of step-by-step instructions to help school nutrition employees follow the school’s food safety processes. The Institute of Child Nutrition has a sample Standard Operating Procedure for managing food allergies that is available on their website (2017).

ASK:
- What Standard Operating Procedure (SOP) do you have in place to handle a recall?
- Do you have a quarantine procedure in place for recalled products?

FEEDBACK:
- Checking inventory for recalled product
- Checking with director to see if you received recalled product
- Putting recalled product in a certain place in their respective areas – dry storage, fridge, or freezer – and marking as **DO NOT USE – RECALLED PRODUCT**

OBJECTIVE: Describe how to find allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods.

SHOW SLIDE: **Reading Labels for Other Allergens**

SAY: We will now discuss allergens that are not among the eight major, when they are in bulk items, and in USDA Foods. We know from earlier information presented in today’s training that eight foods account for 90% of food allergic reactions; that means 10% of food allergic reactions are caused by other foods. According to the CDC’s *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs*, there are more than 170 foods that can cause an allergic reaction (2013).
DO: Refer back to chart paper from the Warm-Up Activity and discuss any allergens in the “Other Allergen” category.

ASK: What are some other allergens that your students are allergic to that are not one of the eight major?

FEEDBACK: Strawberries, sesame, mustard, and sulfites

SAY: Finding these allergens may be more difficult because there is no specific regulation about how they must be labeled. You will need to check the entire ingredient statement for any allergen that is not one of the eight major. Work with the school nurse, director, and parents to be familiar with different ways a food may be listed in an ingredient statement. Always discuss any questions about reading labels for food allergies that are not one of the eight major with your director.

Some ingredients may not be listed on the ingredient statement such as cinnamon or mustard. Different spices or herbs may be listed as just “spices” in the ingredient statement. If you have a child with food allergies to a spice, it is important to talk to your director to determine what spices are included in a food.

SHOW SLIDE: Recognizing Allergens in Bulk Items

SAY: Please turn in your Participant’s Workbook to the Tips for Recognizing Food Allergies in Bulk Items and USDA Foods handout. We are going to discuss some strategies for determining allergens in these items.

**Tips for Recognizing Food Allergies in Bulk Items and USDA Foods**

- Obtain the ingredient statement for the bulk product and identify any known allergens; retain the labeling on bulk packages.
- Use your Standard Operating Procedure for how bulk products will be handled.
  - Determine the number of bulk lots mixed in one storage container.
  - Ensure that the food product added has the same ingredient statement.
  - Prevent cross-contact from utensils and scoops. (For example, do not use flour scoop to scoop sugar.)
  - Clean the bulk storage container thoroughly to remove allergen residue before the container is used for a different product.
- If there is any doubt of the ingredients of bulk product, talk to your director.
- **Always** read USDA Foods product labels for allergens, product brands may change throughout the school year. Do not rely on USDA Foods Fact Sheets.
- Build time in work schedule to read food labels.

SAY: With bulk foods there are some allergen risks. The following steps can help to prevent risks.

- Obtain the ingredient statement for the bulk product, and identify any known allergens; retain the labeling on bulk packages.
- Use your Standard Operating Procedure for how bulk products will be handled.
  - Determine the number of bulk lots mixed in one storage container.
  - Ensure that food product added has the same ingredient statement.
  - Prevent cross-contact from utensils and scoops. (For example, do not use flour scoop to scoop sugar.)
  - Clean the bulk storage container thoroughly to remove allergen residue before the container is used for a different product.
- If there is any doubt of the ingredients of bulk product, talk to your director.

Cross-contact, which we will discuss further in the next lesson, is the accidental transfer of an allergen to an allergen-free food or surface. For example, if someone uses the flour scoop to scoop out corn meal; that would be cross-contact.

ASK: Will a couple of you share your best practices of handling bulk products to eliminate risks for children who have allergies?

DO: Allow time for participants to share some of their best practices.

SAY: Thank you for sharing this information with the group.

SHOW SLIDE: Food Allergens in USDA Foods

ASK: How do you handle USDA Foods regarding food allergens?

FEEDBACK: Obtain and read labels for known allergens, prevent cross-contact, keep labels for 24 hours

SAY: USDA Foods should be addressed similarly to other institutional size commercial products; they have the same labeling requirements. USDA Foods and other supplier brands may change throughout the school year so label reading is important. When determining if a product is free of an allergen, use the actual label and read the ingredient statement. Do not rely on USDA Foods Fact Sheets.

ASK: Are there any questions?

OBJECTIVE: Describe the procedures for reading ingredient statements.

SHOW SLIDE: Procedures for Reading Food Labels

SAY: Recognizing food allergens demands time, attention, and rigorous procedures. Make sure your employees have time to read labels. Build time into their daily or weekly schedule. As a best practice, write ‘reminder’ instructions on production sheets for allergen-free recipes such as:

- Read the ingredient statements of all packages to verify there are no allergens.
- Save or copy/scan package labels to include the ingredient list, allergen statements, and lot and run coding.
SHOW SLIDE:  *Reading Food Labels Activity*

**SAY:** We will now further discuss some strategies used to read labels and ingredient lists. As we talked about in Lesson 1, this should be in your school’s food allergy management plan. We are going to go through a series of questions about the process and procedures for reading labels.

**DO: ACTIVITY: Reading Food Labels**

**Materials:**
- *Reading Food Labels* worksheet
- Chart paper
- Markers

**Time:** 15 minutes

**Instructions:** In the following portion of the Instructor’s Manual, the trainer will ask several questions. Ask participants to follow along on the *Reading Food Labels* worksheet and write their answers as it pertains to their school in the “Answers” section. If they do not know the answer, they should check “Ask My Director.”

**SAY:** Please turn in your workbook to the *Reading Food Labels* worksheet. Like before with the food allergy emergency questions, write your answers in the “Answer” section, and if you do not know the answer, check “Ask My Director” to remind yourself to find out the answer when you get back to your school.
# Reading Food Labels

**Instructions:** Answer the questions for your school’s food allergy management plan. If you do not know the answer, check “Ask My Director” to remind yourself to find out the answer when you get back to your school.

<table>
<thead>
<tr>
<th>Questions</th>
<th>Answers</th>
<th>Ask My Director</th>
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<tbody>
<tr>
<td><strong>Procedures for Reading Food Labels</strong></td>
<td></td>
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<tr>
<td>Who reads labels for food allergens?</td>
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<tr>
<td>If that person is out, who takes on that responsibility?</td>
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<tr>
<td>Could substitutes read the labels?</td>
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<tr>
<td>How often do you read labels for allergens?</td>
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<tr>
<td><strong>Storing Food Labels</strong></td>
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<tr>
<td>Do you keep food labels?</td>
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<td>How long?</td>
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<tr>
<td>What do you do if you cannot find the food label?</td>
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<tr>
<td>How do you find ingredient information for food items where the labels are printed on the case, which is thrown away after stocking the shelves?</td>
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<td></td>
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<tr>
<td>Where are food labels stored?</td>
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<td></td>
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<tr>
<td><strong>Procedures for Changes in Food Labels</strong></td>
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<tr>
<td>What would you do if a substitute product contains a food allergen, the product recipe has changed to contain an allergen, or the product now has a precautionary label?</td>
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</tr>
<tr>
<td>What is your chain of command for communicating that a food label now contains a food allergen?</td>
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<tr>
<td>Who do you tell if you realize that you made a mistake reading a food label and it actually does contain a food allergen?</td>
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<tr>
<td><strong>Communicating Food Allergy Information</strong></td>
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<tr>
<td>How does your school district share food allergy information about menu items?</td>
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<tr>
<td>How do you communicate with a parent or guardian who is requesting additional food allergy information?</td>
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<td>How do you communicate with other school employees, such as the school nurse, principal, or teacher, who are requesting additional food allergy information?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If you cannot answer the question, who do you tell that person to contact?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
SHOW SLIDE: **Procedures for Reading Food Labels**

ASK:
- Who reads labels for food allergens? If that person is out, who takes on that responsibility? Could substitutes read the labels?
- How often do you read labels for allergens?

DO: Give participants 1–3 minutes to write their responses. Have a few participants volunteer to share their answers.

SHOW SLIDE: **Reading Food Labels**

SAY: Labels should be read when the product is received. Since this is time consuming, build time into the schedule for this procedure. Because suppliers may make product substitutions, formulas may change, or vendors could change, check all labels carefully every time. You cannot rely on specifications, fact sheets, or the last shipment. Read the label each time the product is received.

SHOW SLIDE: **Storing Food Labels**

ASK:
- Do you keep food labels? How long?
- What do you do if you cannot find the food label?
- How do you find ingredient information for food items where the labels are printed on the case, which is thrown away after stocking the shelves?
- Where are food labels stored?

DO: Give participants 1–3 minutes to write their responses. Have a few participants volunteer to share their answers.

SHOW SLIDE: **Food Label Storage**

SAY: The CDC’s *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs* recommends that labels of all products served be kept for 24 hours as a precaution so the label is available in case someone has an allergic reaction (2013). Unlike a foodborne illness outbreak where the outbreak can occur days after a food is served, an allergic reaction will happen the day of service. If food is going to be served as leftovers or reused in another recipe, the label should be kept until all product is either consumed or disposed. Keeping a label library is a common practice; some keep the actual label and some scan the label.

SHOW SLIDE: **Procedures for Changes in Food Labels**

SAY: It is very important to let others know if you see a new allergen on a food label. You may need to tell the director, school nurse, teacher, or students. We will now discuss how an employee would communicate this information.
ASK:
• What would you do if a substitute product contains a food allergen, the product recipe has changed to contain an allergen, or now has a precautionary label?
• What is your chain of command for communicating that a food label now contains a food allergen?
• Who do you tell if you realize that you made a mistake reading a food label and it actually does contain a food allergen?

DO: Give participants 1–3 minutes to write their responses. Have a few participants volunteer to share their answers.

SHOW SLIDE: Changes in Food Labels

SAY: As mentioned earlier, recipes for food products can change. Knowing the chain of command for communicating that a food product now contains a food allergen can prevent an allergic reaction. Every school district should clearly outline the chain of command in their food allergy management plan and communicate this to all employees. The food allergy management plan should also cover what actions employees should take if a food label is read incorrectly and contains a food allergen. If this happens, contact your director, and do not serve the food to the child with the allergy.

SHOW SLIDE: Communicating Food Allergy Information

SAY: There are times that you need to communicate information about allergens in the food you serve to people outside the kitchen. Some of the requests may come from the school nurse, parents or guardians, or students.

ASK:
• How does your school district share food allergy information about menu items?
• How do you communicate with a parent or guardian who is requesting additional food allergy information?
• How do you communicate with other school employees, such as the school nurse, principal, or teacher, who are requesting additional food allergy information?
• If you cannot answer the question, who do you tell that person to contact?

DO: Give participants 1–3 minutes to write their responses. Have a few participants volunteer to share their answers.

ASK: Would a couple of you share a time that you were asked for allergy label information?

SHOW SLIDE: Communicating Food Allergies
SAY: If you are uncertain about any of the questions being asked, contact your director.

Electronic records can help share information on the district’s website. Other ways are to prepare handouts, or provide training for your staff or parents or guardians. If you communicate the school’s food allergy management plan, families will understand what is being done to protect their child:

- It is an important priority of the school nutrition department.
- Precautions are being taken to keep children safe.
- You have an emergency action plan if something unexpected occurs.

The **Tips for Managing Food Labels** handout in your Participant’s Workbook captures the tips we have discussed for reading food labels for allergens.

### Tips for Managing Food Labels

#### Reading Food Labels

- Check all labels carefully every time.
  - Read the label each time the product is received.
    - Suppliers may make product substitutions
    - Formulas may change
    - Vendors could change
  - Read labels before preparing food.
- Build time into the schedule for this procedure.
- Do rely on specifications, fact sheets, or the last shipment.

#### Storing Food Labels

- The CDC’s *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs* recommends that labels of all products served be kept for 24 hours.
  - This is a precaution so the label is available in case someone has an allergic reaction.
  - Unlike a foodborne illness outbreak where the outbreak can occur days after a food is served, an allergic reaction will happen the day of service.
- If food is going to be served as leftovers or reused in another recipe, the label should be kept until all product is either consumed or disposed.
- Methods for maintaining the label
  - Keep a label library.
  - Keep the actual label in a designated spot for service that day.
  - Scan or photograph the label.
### Changes in Food Labels

- Knowing the chain of command for communicating that a food product now contains a food allergen can prevent an allergic reaction.
- Every school district should have a food allergy management plan
  - Clearly outline the chain of command.
  - Detail what actions employees should take if a food label is read incorrectly and contains a food allergen.
    - Contact your director.
    - Do not serve the food to the child with the allergy.
- Train employees on plan.

### Communicating Food Allergies

- Methods for communicating
  - Electronic records can help share information on the district’s website.
  - Prepare handouts.
  - Provide training for your staff or parents or guardians.
- If you communicate the school’s food allergy management plan, families will understand what is being done to protect their child.
  - It is an important priority of the school nutrition department.
  - Precautions are being taken to keep children safe.
  - You have an emergency action plan if something unexpected occurs.

**Sources:**


SHOW SLIDE: *Label Reading Role Play Activity*

DO: **ACTIVITY:** Label Reading Role Play

Materials:
- Label Reading role play cards (see appendix)

Time: 5 minutes of group work. 15 minutes to present skit to class.

**Instructions:** Divide participants into four (4) to six (6) groups depending on class size. Each group will be given a role playing scenario. They need to discuss the scenario and assign roles. The group will come up with a skit to introduce the scenario and show a solution. Not everyone in the group may be involved in the skit but should be involved in the discussion.

1. A child allergic to peanuts was served a soy butter sandwich. Her very upset parent comes to you because the child did not eat lunch since she thought it was a peanut butter sandwich.
2. The cook reviewed a food label and noticed a food allergen that was not normally on the label, and it was not flagged. The food is on the line about to be served.
3. You pull frozen chicken tenders from the freezer, but there is no food label on the bag. All ingredient information was on the box that was recycled.
4. While reading a food label, you notice that the pasta sauce now contains wheat.
5. The substitute cook could not find the label for the USDA Foods meatballs, so he used the USDA Foods Fact Sheet.
6. The person that normally reads the labels is out today and a substituted product has been delivered.

**SAY:** I am going to divide everyone into groups and give you a role playing scenario. You will need to discuss the scenario and assign roles. Your group will come up with a short skit to introduce the scenario and show a solution. Not everyone in the group will need to have a role in the skit but should be involved in the discussion. Have fun and be creative!

**DO:** Allow groups 5 minutes to create their skit. Each group will have 3–4 minutes to present their skit.

**SAY:** Great job! Everyone came up with some great solutions!

**SHOW SLIDE: **Lesson 2 Review

**SAY:** We are now finished with our second lesson – Reading Labels for Allergens.

We have covered:
- Finding the eight major allergens in the ingredient statement on the food label.
- Finding allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods.
- Procedures for reading food labels.

**ASK:** What questions do you have before we proceed?
## Lesson 3: Avoiding Cross-Contact

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Explain cross-contact.</td>
<td></td>
<td></td>
<td>5 minutes</td>
</tr>
<tr>
<td>Examine how cross-contact may occur, and develop strategies for preventing it.</td>
<td>Where are the Allergens?</td>
<td>• Glo-germ®&lt;br&gt;• 2 spatulas&lt;br&gt;• Black light&lt;br&gt;• Cleaning and Sanitizing Fact Sheet&lt;br&gt;• Methods for Avoiding Cross-Contact handout&lt;br&gt;• Avoiding Cross-Contact Plan worksheet&lt;br&gt;• Avoiding Cross-Contact Scenario Cards</td>
<td>40 minutes</td>
</tr>
</tbody>
</table>
Lesson 3: Avoiding Cross-Contact

SHOW SLIDE:  **Lesson 3: Avoiding Cross-Contact**

SAY:  In this lesson, we will discuss cross-contact, describe how cross-contact may occur, and strategies for preventing it.

**OBJECTIVE:** Explain cross-contact.

SHOW SLIDE:  **Cross-Contact versus Cross-Contamination**

SAY:  Many people confuse cross-contact and cross-contamination. The terms are often used interchangeably; however, they have different meanings.

Cross-contamination occurs when microorganisms are transferred from a food, person, or surface to another food. Cooking *does* reduce or eliminate the chances of a person getting foodborne illness. Examples of cross-contamination include:

- Cutting raw meat on a cutting board, then chopping up fresh vegetables for the salad bar on the same cutting board without cleaning, rinsing, and sanitizing it in between.
- Not changing gloves and washing hands in between handling raw chicken and fresh fruit.
- Not properly cleaning a container that held raw meat, then putting bread in it.

As explained in the FDA *Food Code*, cross-contact occurs when an allergen is transferred from a food containing an allergen to a food or surface that *does not* contain the allergen (2017). Cooking *does not* reduce or eliminate the allergen protein, so a person with a food allergy can still have a reaction to cooked food.

An example of cross-contact would be using a knife to spread peanut butter and only wiping it clean before using it to spread jelly. If the peanut butter goes into the jelly jar, the jelly cannot be used for a child with a peanut allergy. Peanut protein could remain on the knife and cause an allergic reaction for that child. Also, if that knife was used to spread peanut butter on wheat bread and then placed back into the peanut butter, that peanut butter cannot be used for a child with a wheat allergy.

All equipment and utensils must be cleaned with hot, soapy water, rinsed, sanitized, and air dried before being used to prepare allergen-free food. Even a small trace of food, which could be invisible to the naked eye, can cause an allergic reaction. Even food that is burnt onto pans and grills may cause a reaction.

Other examples of cross-contact include:

- Flour used to make bread lands on another surface.
- Measuring out milk in a liquid measuring cup and then measuring out broth without cleaning in between.
- Spilling food on the serving line into other food while serving it to children.
OBJECTIVE: Examine how cross-contact may occur, and develop strategies for preventing it.

SHOW SLIDE: *Potential Sources of Cross-Contact*

SAY: There are several potential sources of cross-contact. They include:
- Food handling and preparation
- Insufficient handwashing
- Insufficient cleaning
- Shared equipment, utensils, cutting boards, and counters
- Splatter or steam from cooking
- Salad bars, buffets, and serving stations

ASK: Can you think of any other situations of cross-contact?

DO: Allow participants to respond.

ASK: How do you know if there has been cross-contact in your facility?

FEEDBACK:
- Observe work practices of employees.
- Store allergen-free foods below those containing allergens.
- When it happens, speak professionally to the employee and remove the food.

SHOW SLIDE: *Where are the Allergens? Activity*

SAY: We will now do the activity Where are the Allergens?

DO: **ACTIVITY: Where are the Allergens?**

Materials:
- Glo-germ®
- 2 spatulas or other kitchen utensils (half should have Glo-germ® on them)
- Black light
- Cleaning and Sanitizing Fact Sheet

Time: 2–3 minutes of demonstration

Instructions: There will be two spatulas, one with Glo-germ® and one without. Discuss how allergens are not always visible to the naked eye, and ask which spatula has the “allergen” (Glo-germ®) on it. After giving the class a chance to answer, use the black light to show which spatula had the “allergens.” Have participants review the **Cleaning and Sanitizing Fact Sheet** and reinforce the importance of properly cleaning, rinsing, and sanitizing. Cleaning with warm, soapy water and the friction of scrubbing removes allergens, and the sanitizer helps kill microorganisms.
SAY: You see two spatulas in front of you. Please let me know if you can tell which one has allergens on it.

DO: Allow time for participants to guess which utensils have allergens on them. Then, use the black light to show which utensils have allergens.

SHOW SLIDE: *Cleaning and Sanitizing*

SAY: You can see why it is important to be aware of the possibility of cross-contact. Allergens are generally not visible to the naked eye and, therefore, can be accidentally transferred to allergen-free foods easily. Proper cleaning and sanitizing procedures in schools are needed to remove allergens. Please turn in your Participant’s Workbook to the *Cleaning and Sanitizing Fact Sheet*. This fact sheet provides the steps for properly cleaning and sanitizing all food contact surfaces and equipment. As you can see, it is important to wash, rinse, and sanitize. Cleaning with warm, soapy water and scrubbing to provide friction removes allergens, and sanitizing helps kill microorganisms. Sanitizing alone will NOT remove allergen residue.
Cleaning and Sanitizing Fact Sheet

Introduction
Cleaning and sanitizing is an important prerequisite program for food safety in any school nutrition program. School nutrition employees who follow proper cleaning and sanitizing practices reduce the risk of cross-contamination, which can lead to foodborne illness, and cross-contact, which can contribute to an allergic reaction.

Here Are the Facts
Research conducted by the U.S. Food and Drug Administration (2009) shows that contaminated equipment is a risk factor for food safety in retail foodservice establishments, which include schools, hospitals, nursing homes, and restaurants. Cleaning and sanitizing is an area in which a high number of foodservice operations did not follow appropriate practices.

Application
Clean and sanitize work surfaces, equipment, and other food contact surfaces using proper procedures.

- Follow state and local health department requirements.
- Follow manufacturer’s instructions regarding the use and cleaning of equipment.
- Follow manufacturer’s instructions regarding the use of chemicals for cleaning and sanitizing food contact surfaces.
- Refer to the Safety Data Sheet (SDS) provided by the manufacturer if you have questions about the use of specific chemicals.
- Wash, rinse, and sanitize food contact surfaces of sinks, tables, utensils, thermometers, carts, and equipment:
  - Before each use.
  - Between uses when preparing different types of raw animal foods such as eggs, fish, meat, and poultry
  - Between uses when preparing ready-to-eat foods and raw animal foods such as eggs, fish, meat, and poultry
  - Any time contamination occurs or is suspected
  - After a food with a food allergen has been prepared and before preparing an allergen-free food
- Wash, rinse, and sanitize food contact surfaces using the following procedures:
  - Wash surface with detergent solution to clean.
  - Rinse surface with clean water to remove debris and detergent.
  - Sanitize surface using a sanitizing solution mixed at the concentration specified on the manufacturer’s label.
  - Allow items to air dry.

Take corrective action to make sure that cleaning and sanitizing is done properly.
- Wash, rinse, and sanitize dirty food contact surfaces.
- Sanitize food contact surfaces if it cannot be determined if they have been sanitized properly.
- Discard food that comes in contact with food contact surfaces that have not been cleaned and sanitized properly.

Remember, follow state or local health department requirements.

ASK: What method is used to clean cafeteria tables?

DO: Pause to listen to participant responses.

SAY: Sometimes sanitizing wipes are used, and sometimes the tables are only cleaned with a sanitizing solution. These methods will not remove the allergen residue and may increase the risk of exposure to a child with food allergies.

ASK:
• How often are tables cleaned with soap, water, and friction?
• How can the risk of cross-contact be reduced or eliminated?

SAY: Think about your procedures for cleaning and sanitizing. They may need to be updated to reduce the risk of cross-contact.

Next, we will describe some strategies that you may already use, as well as some strategies you have yet to consider when avoiding cross-contact with food allergies.

SHOW SLIDE: Preventing Cross-Contact

SAY: Please turn in your Participant’s Workbook to the Methods for Avoiding Cross-Contact handout. This handout provides tools and tips as well as example scenarios. As you can see, some ways you can prevent cross-contact are:
• Color coding utensils, equipment, etc.
• Isolating ingredients containing allergens
• Individual preparation of menu items without allergens
• Sticker or color code wrapped food
• Following SOPs for handwashing, cleaning, and sanitizing

DO: Read a few of the examples from the Methods for Avoiding Cross-Contact handout and ask participants for solutions.
Methods for Avoiding Cross-Contact

**Cross-Contact**: Occurs when an allergen is accidentally transferred from a food containing an allergen to a food or surface that does not contain the allergen.

**Example**: Using a knife to spread peanut butter for peanut butter and jelly sandwiches, and then using the same knife to cut a turkey sandwich without cleaning and sanitizing between uses.

**How to Avoid It**
- Wash hands before preparing foods that are allergy-free.
- Wear single-use gloves.
- Use a clean apron when preparing allergy-free food.
- Wash with hot, soapy water making sure to scrub, then rinse and sanitize all utensils, equipment, and food contact surfaces before and after each use.
- If possible, designate an allergy-free zone in the kitchen. When working with multiple food allergies, set up procedures to prevent cross-contact within the allergy-free zone.
- Prepare food items that do not contain allergens first. Label and store the allergy-free items separately.
- If possible, use clean potholders and oven mitts for allergy-free foods to prevent cross-contact.

**Source**: Institute of Child Nutrition. (2017). *Serving safe food to students with food allergies (Sample SOP)*. Retrieved from www.theicn.org/foodsafety
## Methods for Avoiding Cross-Contact, cont.

### Examples for Avoiding Cross-Contact

<table>
<thead>
<tr>
<th>Problem</th>
<th>Solution</th>
</tr>
</thead>
</table>
| A knife used to spread peanut butter may also be dipped in the jelly jar, tainting the jelly with peanut protein. | • Keep a separate jelly jar for the child with allergies. Use clean spoon to put jelly on bread.  
• Put jelly on first using a separate spoon. |
| You prepare an allergen (e.g. chopping walnuts on a cutting board) and then another food (e.g. slicing tomatoes) without properly cleaning. | Make the allergen-free food first. Clean foodservice equipment including the cooking area with hot, soapy water. |
| Ingredients from an allergenic food may splatter, splash, or spill into the allergen-free food when making a catering platter. | Prepare the allergen-free foods first, cover, and remove from the preparation area prior to preparing the foods for others. |
| You know that a student has a severe peanut allergy. You observe that another student in the dining room has a hand full of peanuts and is laughing with friends and pointing at the boy with the allergy. | Go to the student with the peanut allergy and escort him from the dining room. Make sure you know where his epinephrine auto-injector is located. Tell the principal about the situation, and sit in on the meeting with the students. |
| Allergen-free foods may come in contact with an allergen in storage, in the refrigerator, or the dry storage. | Designate a separate shelf in the refrigerator and cupboard for allergen-free foods. This shelf should be above the shelf that may store foods with potential allergens. Consider using stickers to identify “safe” foods. Discard anything that is suspected of cross-contact, or do not use it for the child with allergies. |
| Kitchens may slice various meats and cheeses on shared equipment. Meats could contain allergenic ingredients such as milk, soy, wheat or nuts. | • Make sure staff are following Standard Operating Procedures to clean equipment.  
• Slice allergen-free food first. |
| Cafeteria lines and buffets may have greater risk of cross-contact due to shared utensils and spills. | Have the school nutrition manager keep the safe food separate to prevent cross-contact. |
ASK: Do you have any other potential solutions or prevention ideas?

DO: Allow time for questions and responses.

SAY: Thank you for sharing your ideas. It is our responsibility to provide allergen-safe food to students each and every time.

SHOW SLIDE: **HACCP-Based Food Safety Plan**

SAY: HACCP stands for Hazard Analysis Critical Control Points. It is a detailed food safety plan that looks at your specific facility and addresses food safety problems that may occur. The goal of a HACCP-based food safety plan is to control, prevent, and minimize food safety risks that may cause illness or injury. A HACCP-based food safety plan contains Standard Operating Procedures (SOPs). A Standard Operating Procedure is a set of step-by-step instructions to help school nutrition employees follow the school’s food safety processes. Following SOPs can reduce the risk of a foodborne illness outbreak and allergic reactions. Speak to your director about your district’s specific SOPs. ICN provides sample SOPs such as the **Cleaning and Sanitizing Food Contact Surfaces** and **Serving Safe Food to Students with Food Allergies** at www.theicn.org/foodsafety (2017).

We are now going to do an activity to tie what you have learned back to your school.

SHOW SLIDE: **Avoiding Cross-Contact Plan Activity**

DO: **ACTIVITY: Avoiding Cross-Contact Plan**

Materials:
- Avoiding Cross-Contact Plan worksheet

Time: 5 minutes of individual work; 5 minutes of reporting out

**Instructions:** Participants will reflect on what they have learned in Lesson 3. Using the Avoiding Cross-Contact Plan worksheet, participants will write where cross-contact can occur during the flow of food process. Then, participants will write what processes their district uses to prevent that situation of cross-contact. Have a few participants report out for each process.

SAY: It is important that avoiding cross-contact be included in your school’s food allergy management plan. Please turn in your Participant’s Workbook to the Avoiding Cross-Contact Plan worksheet. For your school kitchen, write situations where cross-contact can occur during the flow of food process. Then, write what processes your district uses to prevent that situation of cross-contact. If you do not know what your district specific plans are, talk to your director.
Avoiding Cross-Contact Plan

**Instructions:** For your school kitchen, write situations where cross-contact can occur during the flow of food process. Then, write what procedures your district uses to prevent that situation of cross-contact. Any questions you have for your director, write at the bottom.

<table>
<thead>
<tr>
<th>Cross-Contact Occurs</th>
<th>Procedure for Avoiding It</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receive</td>
<td></td>
</tr>
<tr>
<td>Store</td>
<td></td>
</tr>
<tr>
<td>Prepare</td>
<td></td>
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<tr>
<td>Cook</td>
<td></td>
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<tr>
<td>Hold</td>
<td></td>
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<tr>
<td>Serve</td>
<td></td>
</tr>
<tr>
<td>Store</td>
<td></td>
</tr>
</tbody>
</table>

**Ask My Director:**

______________________________________________________________________________
______________________________________________________________________________
______________________________________________________________________________

Institute of Child Nutrition 63
Instructor’s Note: This is an example list of processes for preventing cross-contact in the Receiving Area of the kitchen.

Example:
• Inspect delivery vehicle for possible cross-contact.
• Visually inspect all items and look for signs of contamination or container damage.
• Check expiration and pack dates.
• Check substitutions for approved brands and check product labels.
• Reject unacceptable items.

DO: Allow participants 5 minutes for individual work. For another 5 minutes, ask some participants to share their best practices as you walk through each process.

SHOW SLIDE: Avoiding Cross-Contact Scenario Activity

DO: ACTIVITY: Avoiding Cross-Contact Scenario

Materials:
• Avoiding Cross-Contact Scenario Cards (see appendix)

Time: 5 minutes of group work, 15 minutes to present to class

Instructions: Divide participants into six (6) groups. Each group will be given a scenario. They need to read the scenario, identify the hazard, discuss how their school addresses this hazard, and create a best practice to share with the class.

**Receiving**
• When receiving dry goods, you notice flour all over the back of the truck. The driver explains that a bag broke open. The flour is on everything including the canned goods you just received.

**Storing**
• The designated allergen-free food shelf has an allergen containing food on it.

**Preparing**
• The cans of fruit cocktail pulled for lunch are covered in flour.

**Cooking**
• The pan used to bake fish sticks is used to bake skinless chicken breasts without cleaning in between.

**Serving**
• While serving food on the line, you realize you have used the fish stick tongs to serve french fries.

**Holding**
• The remaining burgers are moved to the same pan to place in the hot-holding cabinet between lunches. Burgers containing soy are placed on one side of the pan and soy-free burgers are on the other.
SAY: I am going to divide everyone into six (6) groups and give each group a scenario for avoiding cross-contact. You will need to discuss the scenario and identify the hazard that may or has occurred. Your group will discuss what your schools do to address this hazard. As a group, create a best practice for avoiding cross-contact for your scenario.

DO: Allow groups 5 minutes to discuss their scenario and create a best practice. Each group will present their best practice to the class. Possible answers have been provided.

**Receiving**
- Hazard: Possibility of flour getting into foods in truck.
- Best Practice:
  - Option 1: Have a procedure in place to refuse deliveries that are unsafe.
  - Option 2: Thoroughly wash cans with soap and water before using.

**Storing**
- Hazard: Chance of allergen getting into allergen-free food.
- Best Practice: Check to ensure that the allergen-free items are in secure packaging. Discard any food that may have come in contact with the allergen.

**Preparing**
- Hazard: Flour can get into fruit cocktail when can is opened.
- Best Practice: Thoroughly wash cans with soap and water before using.

**Cooking**
- Hazard: Fish proteins may still be present on pan and cross-contact with chicken.
- Best Practice: Mark the chicken breasts in accordance with your school food allergy management plan that they are not safe to serve to children with fish allergies.

**Serving**
- Hazard: Fish protein may be present on the tongs. The french fries may now have fish proteins in them.
- Best Practice: Replace both sets of tongs with washed, rinsed, and sanitized tongs. Replace french fries with a fresh batch.

**Holding**
- Hazard: Cross-contact may have occurred between soy burgers and beef burgers.
- Best Practice: Mark the burgers in accordance with your school food allergy management plan that they are not safe to serve to children with soy allergies.

SAY: Great job!

SHOW SLIDE: Lesson 3 Review
SAY: We have now finished our third lesson – Avoiding Cross-Contact.

We have covered how to:
  • Explain cross-contact.
  • Examine how cross-contact may occur and develop strategies for preventing it.

ASK: What questions do you have before we proceed?
Lesson 4: Accommodating Children with Food Allergies

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Describe methods for supporting children with food allergies.</td>
<td></td>
<td>• Laws Related to Disabilities and Privacy handout</td>
<td>10 minutes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Role of the School Nutrition Staff in Food Allergy Management handout</td>
<td></td>
</tr>
<tr>
<td>Determine strategies to manage food prepared and served outside of the cafeteria.</td>
<td>Reduce the Risk</td>
<td>• Reduce the Risk worksheet</td>
<td>15 minutes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Chart paper</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Markers</td>
<td></td>
</tr>
</tbody>
</table>
Lesson 4: Accommodating Children with Food Allergies

SHOW SLIDE:  Lesson 4: Accommodating Children with Food Allergies

SAY: In this lesson, we will discuss the laws related to food allergies, accommodating children with food allergies, and managing food from outside of the cafeteria.

OBJECTIVE: Describe methods for supporting children with food allergies.

SHOW SLIDE:  Respect and Protect Children with Food Allergies

SAY: Along with ensuring that the food we serve children is safe, respecting and protecting the privacy of children with food allergies is important. Civil rights and privacy laws apply to all of us. When food allergies or intolerances are considered a disability, schools are required by Federal laws and regulations to make a meal accommodation.

There is no way to provide 100% confidence that the allergen will not be introduced. The CDC’s Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs recommends providing Allergy Safe Zones coupled with education and training (2013). However, children with allergies should never be forced to use these zones and should never be singled out.

Research done by FARE shows that children with food allergies may be bullied, teased, or harassed at school, not only by other children, but sometimes by teachers and school staff (Facts about Food Allergy Bullying, n.d.). Verbal abuse appears to be the most common offense. In reported cases, children describe being physically threatened by having the allergen thrown at or dangled in front of them, or being smeared with their allergen. You should know what steps to take when you catch someone bullying a child with food allergies. Always encourage them to notify an adult if they are being harassed or threatened by other students or adults as it relates to their food allergy.

Please turn to the Laws Related to Disabilities and Privacy handout in your Participant’s Workbook. This handout gives details about the laws related to food allergy management in schools. We will only briefly cover these laws, but this handout provides further information.
# Laws Related to Disabilities and Privacy

<table>
<thead>
<tr>
<th>Federal Laws</th>
<th>How It Relates to School Nutrition</th>
</tr>
</thead>
</table>
| **Rehabilitation Act of 1973** | Prohibits discrimination against qualified persons with disabilities in programs or activities of any agency of the Federal government’s executive branch or any organization receiving Federal financial assistance:  
- National School Lunch Program  
- School Breakfast Program  
- Fresh Fruit & Vegetable Program  
- After School Snack Program |
| **504 Plan derived from this law** | |
| **Individuals with Disabilities Education Act (IDEA )1975, Part B 2006** | Requires a free and appropriate public education be provided for children with disabilities ages 3–21 |
| **IEP Plan derived from this law** | |
| **Americans with Disabilities Act (ADA) 1990 and 2008 Amendments** | Broadens and extends civil rights protection for approximately 50 million Americans with disabilities  
According to the ADA, all food allergies and intolerances have the potential to be considered disabilities. |
| **The Health Insurance Portability & Accountability Act (HIPPA) 1996** | Requires all medical records disclosed be kept properly confidential  
Gives the patient rights to control how health information is used |
| **Family Educational Rights and Privacy Act (FERPA) 1974** | Protects the privacy of health information entered into a student’s record |

SHOW SLIDE:  **Federal Disability Laws**

**SAY:** In *Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals*, the USDA outlines three Federal laws that cover the treatment of those with disabilities participating in Federal programs, like Child Nutrition Programs (2017):

1. *Rehabilitation Act of 1973; Section 504 of the Act*
2. *Individuals with Disabilities Education Act (IDEA)*
3. *Americans with Disabilities Act (ADA)*

For school nutrition programs, these laws prohibit the discrimination of children with disabilities and require accommodations be made.

In 2008, *ADA Amendments Act* broadened the definition of disabilities to include most food allergies and intolerances. A state licensed healthcare professional will make the determination of whether a child has a disability. A child's condition does not have to be life threatening to be considered a disability; for example, a food allergy may still be considered a disability even if it does not cause anaphylaxis and is not life threatening.

**Instructor’s Note:** As explained in the USDA guidance, the ADA broadened the definition of disabilities to encompass impairments that limit major life activities; major bodily functions was added as part of extending the definition of disability (*Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals*, 2017).

Major life activities examples include (but are not limited to) caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

Major bodily functions examples include (but are not limited to) functions of the immune system; normal cell growth; and digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.

SHOW SLIDE:  **Federal Privacy Laws**

**SAY:** The two laws that deal with privacy for children with disabilities are the *Health Insurance Portability and Accountability Act* of 1996 (HIPAA) and the *Family Educational Rights and Privacy Act* of 1974 (FERPA). These laws require schools to keep medical information about a child confidential and to protect privacy of the student.

**ASK:** How does your district keep information you receive confidential?

**FEEDBACK:**

- Keep it in a locked file cabinet.
- Keep it electronically in a password protected file.
- Look at it in the office and leave it in the office.
- Point-of-sale system
- Cafeteria manager’s copy
- School Nurse → School Nutrition Director (keeps it in locked cabinet) → School Nutrition Staff (aware of children with allergies and what not to serve them)
If these laws are violated, a civil rights complaint could be filed and an investigation would ensue. Showing the parents or guardians that the school has a food allergy management plan in place and that you understand the necessity of following what the state licensed healthcare professional’s statement requires will build trust with the family.

This was a very quick overview of regulations. What questions do you have?

Allow some time for questions. Answer any questions to the best of your abilities. Write down any questions you cannot answer and contact ICN for clarification.

Students with disabilities including food allergies should have a written plan for managing their disabilities. This plan could be a 504 Plan, Individualized Education Plan (IEP), or Individualized Healthcare Plan (IHP). These plans are written and agreed to by a team of professionals at the school, the parent or guardian, and the student when he/she is age appropriate. If the plan involves meal modification from the School Nutrition Department, this part of the plan will need to be shared. Contact your director for more information.

It is important to be aware of the food allergies in your school. This means knowing which students have allergies and protecting children with food allergies when food is prepared and served.

How do you know which students in your school have food allergies and what they are?

USDA guidance is clear that when a student’s disability prevents them from consuming a school meal as prepared, meal accommodations must be made (Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals, 2017). If a disability causes a child to have a meal that does not follow the meal pattern, a written medical statement signed by a state licensed healthcare professional is required for reimbursement. A child should not be charged extra for these modifications. Cashiers need to be notified when a meal accommodation does not meet the traditional meal pattern regulations.

It is vital to exactly follow the medical instructions of the state licensed healthcare professional. Do not make guesses or variations from the medical statement. The medical statement should contain information on the disability (food allergy or intolerance), an explanation of how to accommodate the child’s disability, and the food or foods to be omitted and recommended alternatives. If you are unable to make the accommodations as instructed or do not understand the instructions, talk to your director. USDA Food and Nutrition Service strongly encourages school nutrition programs to have detailed documentation about the actions taken to accommodate a child with food allergies.

If there is no disability, the accommodation is not required but can be made as a gesture of support and customer service. An example would be a requested dietary preference for religious or cultural reasons. In many cases, preferences can be dealt with through Offer Versus Serve (OVS) or by providing additional selections.
ASK: What accommodations has your school made for a child with a food allergy or food intolerance?

SHOW SLIDE: The Team

SAY: Please turn in your Participant’s Workbook to the Roles of School Nutrition Staff in Food Allergy Management handout. This handout details ways you can be part of a team with open communication and education for all those involved with your district’s food allergy management.

Roles of School Nutrition Staff in Food Allergy Management

Some of the ways you do your part for the food allergy team are to:
• Create an environment where children with food allergies will be safe.
• Read food labels carefully.
• Communicate and share with school staff, parents or guardians, and students the ingredient statement information.
• Prevent cross-contact of potential food allergens by following food safety SOP.
• Follow food allergy management plan set by school district.
• Ensure a safe school environment by reporting any discrimination or bullying.
• Have in place a system to identify students with food allergies without compromising privacy or confidentiality rights.
• Make food accommodations for students with food allergies according to their individual allergy plan.
• Know the emergency response protocol to respond to an allergic reaction incident.
• Train all your staff including substitutes on food allergies.
• Attend professional development on food allergies.

SAY: Have a good communication system with your school nurse. Together you can coordinate accommodations and discuss any additional allergies that may not require a medical statement, i.e. meet the meal pattern requirements. (State agencies may still require a medical statement regardless.) Always make sure to include your director in the conversation so that everyone knows the same information. As you remember in the video we watched earlier, a lack of communication contributed to a child dying from an allergic reaction.

SHOW SLIDE: Accommodating Students with Other Food-Related Disabilities

SAY: Food allergies are not the only food-related disabilities that you may encounter and need to accommodate. For instance, diabetes and phenylketonuria (PKU) both require that accommodations be made in school meals. There are also accommodations needed in other situations, such as for students who are tube fed or require food to be pureed for medical reasons. The information contained in USDA’s guidance, Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals, applies to all of these situations (2017).

OBJECTIVE: Determine strategies to manage food prepared and served outside of the cafeteria.

SHOW SLIDE: Strategies to Manage Outside Food

SAY: Besides the food you prepare and serve in the cafeteria, there may be food made by an outside source that is prepared and served in the cafeteria (e.g. food supplied by a restaurant or caterer.)

ASK: How do you communicate about food allergies with these outside suppliers?

DO: Pause to listen to participant responses.

SAY: There are many opportunities for you to prepare food in the cafeteria and serve it outside the cafeteria, for instance, Breakfast in the Classroom or the Fresh Fruit and Vegetable Program.

ASK: What are some other instances where food prepared in the cafeteria is served outside of the cafeteria?

FEEDBACK: Afterschool program, field trip, PTA meeting, sporting event, etc.

ASK: How do you distinguish an allergen-free food from the rest of the food items for a program such as Breakfast in the Classroom?

DO: Pause for participant responses.

ASK: What are some other food allergy problems that could happen once this food leaves the kitchen?
FEEDBACK:
- Lose control once food is delivered
- Not sure what cleaning methods are used on surfaces
- Not sure what handwashing procedures are used
- Not sure how leftovers are stored

SAY: Then, there are other situations where outside food is served throughout the school such as potluck celebrations, classroom projects, school organizations, or club and sporting events.

ASK:
- What are the food allergy complications surrounding this food?
- Are you involved with any of these events?
- If there were a food allergy emergency, would you be questioned or implicated?
- Would the people think the food came from nutrition services?

DO: Pause to listen to participant responses.

SHOW SLIDE: Reduce the Risk Activity

SAY: The next activity deals with food from outside sources.

DO: ACTIVITY: Reduce the Risk

Materials:
- Reduce the Risk worksheet
- Chart paper (one per table)
- Markers

Time: 5 minutes of group work, 15 minutes class discussion

Instructions: Participants will be divided into five (5) groups. Each group will be given a scenario of a child with a food allergy being fed food from an outside vendor. The group will discuss possible solutions for keeping the child safe. Groups will then write their solutions on the chart paper.

SAY: Please turn in your Participant’s Workbook to the Reduce the Risk worksheet. I’m going to count you off into five (5) groups. Each group will be assigned one of the scenarios. You will determine how to safely provide food to a child with known life-threatening food allergies from an outside food source. Record the actions you would take to provide for the child on the chart paper. Select a spokesperson from your group to share.

DO: Assign a scenario to each group. Allow 5 minutes for groups to discuss and write out solutions. Then ask for each group to choose a spokesperson and report out their solution.
### Reduce the Risk Possible Answers

**Instructions:** Work in small groups to determine how to safely provide food from an outside source to a child with known life-threatening food allergies in the scenario you are assigned. Record the actions you would take to provide for the child on the chart paper. Select a spokesperson from your group to share and the actions your group would take to provide for the child.

<table>
<thead>
<tr>
<th>Group</th>
<th>Scenario</th>
<th>Actions to Provide</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Xander has a wheat allergy. His eighth grade class does Breakfast in the Classroom. Pre-made omelets with cheese sauce are on the menu. The cheese sauce contains wheat.</td>
<td>Determine an appropriate substitute for Xander that does not contain wheat. Prepare the substitute so that cross-contact does not occur. Wrap, label, and separate Xander’s food to prevent cross-contact.</td>
</tr>
<tr>
<td>B</td>
<td>Ashlee is going on a field trip with her fourth grade class. The students will get lunch from a local fast food restaurant with fried fish. Ashlee is allergic to fish.</td>
<td>Coordinate with the school staff to provide an appropriate substitution such as a meal from the School Nutrition Program.</td>
</tr>
<tr>
<td>C</td>
<td>Chris, age 7, is allergic to wheat and soy. You are serving food from a local Mexican restaurant to celebrate Cinco de Mayo.</td>
<td>Obtain a copy of the restaurant’s menu and speak to the restaurant manager about what allergens are in the foods. Make some wheat and soy free menu options. Assist child to select wheat and soy free menu choices. Have servers serve the food to prevent cross-contact from utensils or if the risk is too great, make a plate for the child when the food arrives; keep food separate and in a warmer.</td>
</tr>
<tr>
<td>D</td>
<td>Jasmine has a history of anaphylaxis in response to milk. Jasmine goes to the afterschool program where snacks are prepared by the cafeteria staff and served by the program staff. Snacks from donations are served, too.</td>
<td>Train afterschool staff to manage food allergies. Ensure donations come with ingredient statements to look for allergies. Train the children in the afterschool program on the importance of no food sharing. Be sure Jasmine’s auto-injector is available during the afterschool program. Have SOP for managing food allergies for afterschool program.</td>
</tr>
<tr>
<td>E</td>
<td>Rachel, age 12, tells the cafeteria monitor, “My throat is sore.” The teacher notices that Rachel is flushed and developing hives. Rachel has no history of a food allergy. The school nurse is at another school today.</td>
<td>Follow emergency food allergy action plan. Immediately call 911 for emergency medical services to come to the school; tell them an allergic reaction is suspected and to bring epinephrine. Notify parents or guardians. Notify school nurse or district nurse of the situation.</td>
</tr>
</tbody>
</table>
SAY: Please select a spokesperson and share your findings with the group.

DO: Allow 15 minutes for groups to report.

SHOW SLIDE: Lesson 4 Review

SAY: We are now finished with our fourth lesson – Accommodating Children with Food Allergies. We have covered ways to successfully manage food allergies in schools by:

• Describing methods for supporting children with food allergies.
• Determining strategies to manage food prepared and served outside of the cafeteria.

ASK: Do you have any questions?
## Wrap-Up

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
</table>
| Make It Stick   |                                 | • Participant’s Workbook  
|                 |                                 | • Pen or pencil  
|                 |                                 | • Food Allergy Resources handout  
|                 |                                 | • *Manager’s Corner: Food Allergies*                                     | 5 minutes    |
| Post-Assessment |                                 | • Post-Assessment  
|                 |                                 | • Course Evaluations  
|                 |                                 | • Certificates                                                          | 10 minutes   |
Wrap-Up

SAY: We have learned a lot about food allergies today. We are going to take some time now to discuss some items and answer questions that you have.

DO: Review and answer any question on the “Bike Rack” chart paper.

SHOW SLIDE: *Make It Stick*

DO: **ACTIVITY: Make It Stick**

Materials:
- Participant’s Workbook
- Pen or pencil

Time: 5 minutes of individual work

Instructions: Ask participants to look back at **Food Allergy Emergency** worksheet in Lesson 1 and the **Reading Food Labels** worksheet in Lesson 2. On the front of their Participant’s Workbook, have participants list questions to ask their director and answer the question, “What is the FIRST food allergy task I plan to do when I get back?” Ask a few participants what they wrote.

SAY: Please turn to look the **Food Allergy Emergency** worksheet in Lesson 1 and the **Reading Food Labels** worksheet in Lesson 2. Take a second to review them and gather your thoughts. Then on the front of your Participant’s Workbook, list questions to ask your director and write your answer to this question, “What is the first food allergy task that I plan on doing when I get back?”

DO: Allow 1–2 minutes for participants to write their answers.

ASK: Would a few of you share what you wrote?

DO: Allow 1–2 minutes for participant responses.

SAY: In your Participant’s Workbook, there is list of resources about food allergies. You can use these resources to help educate your staff and school.
Food Allergy Resources

**Manuals**


**Website Resources**

Centers for Disease Control and Prevention
http://www.cdc.gov/healthyyouth/foodallergies/

Food Allergy Research and Education (FARE)
http://www.foodallergy.org/

Institute of Child Nutrition
- Food Allergy Resources including fact sheets and mini-posters: www.theicn.org/foodsafety
- Food Allergies for School Nutrition Programs: www.theicn.org/elearning
- Food Safety Standard Operating Procedures: www.theicn.org/foodsafety

NEA Health Information Network

United States Department of Agriculture, Food and Nutrition Service
SHOW SLIDE:  **Manager’s Corner: Food Allergies**

**SAY:** ICN created a resource for training your staff on the food allergy topics you learned today. *Manager’s Corner: Food Allergies* is designed to give managers an easy-to-use lesson plan for training staff in various food safety topics. Each lesson is roughly 15 minutes and contains the following:

- Learning objective
- Statement explaining the importance of the topic
- List of materials
- Instructions on how to present the information
- Questions to ask staff
- Suggested responses to questions
- Additional resources to strengthen or refresh the knowledge of the manager

SHOW SLIDE:  **Post-Assessment**

**SAY:** We have just a few more things to do before today’s class comes to an end. I will have you do the post-assessment, complete a course evaluation, and we’ll be sure everyone signed the roster. Please make sure to put the 4-number identifier that you used for the pre-assessment in the top right corner.

**DO: ACTIVITY: Post-Assessment**

**Materials:**
- Post-Assessment

**Time:** 10 minutes of individual work

**Instructions:** Pass out post-assessment to participants. Remind them to write their identifier. Allow time for participants to take the post-assessment, and then pick them back up.

**SAY:** I will now pass out the post-assessment. Answer the questions to the best of your ability. We have gone over all of the content during the training.

**DO:** Refer to answer key and review answer for each question.

SHOW SLIDE:  **Training Wrap-Up**

**ASK:** What questions may I answer for you?

**DO:** Provide participants the course evaluation form. Make sure all participants have signed the attendee roster. Provide attendees a Certificate of Attendance.

**SAY:** Please complete the training evaluation forms.
SHOW SLIDE:  *Thank You!*

**SAY:** Accessing ICN via the web is an excellent way to have access to important, timely, and expertly designed resources. Numerous food allergy, food safety, food security, and emergency management resources are available to download for free from www.theicn.org.

Thank you for participating today and be a PAL by Protecting a Life from food allergies.
References


Appendix

Instructions: Print out one-sided.

Allergen Picture Printouts
Ingredient Statement Printouts
Label Reading Role Play Cards
Avoiding Cross-Contact Scenario Cards
# Allergen Picture Printout

<table>
<thead>
<tr>
<th>MILK</th>
<th>EGGS</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="milk.png" alt="Milk" /></td>
<td><img src="eggs.png" alt="Eggs" /></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>WHEAT</th>
<th>PEANUTS</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="wheat.png" alt="Wheat" /></td>
<td><img src="peanuts.png" alt="Peanuts" /></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TREE NUTS</th>
<th>SOY</th>
</tr>
</thead>
<tbody>
<tr>
<td>(e.g. walnuts, almonds, cashews, pistachios, and pecans)</td>
<td><img src="soy.png" alt="Soy" /></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FISH</th>
<th>CRUSTACEAN SHELLFISH</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="fish.png" alt="Fish" /></td>
<td>(e.g. crab, lobster, and shrimp)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OTHER ALLERGENS</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="other_allergens.png" alt="Other Allergens" /></td>
</tr>
</tbody>
</table>
Label A

INGREDIENTS: CULTURED PASTEURIZED SKIM MILK, MILK, WHEY PROTEIN CONCENTRATE, SALT, WHEY, NATURAL FLAVOR, XANTHAN GUM, LOCUST BEAN GUM, GUAR GUM, VITAMIN A PALMITATE, SORBIC ACID AND CARBON DIOXIDE (TO MAINTAIN FRESHNESS).

CONTAINS: MILK
Label B

INGREDIENTS: SALT, MONOSODIUM GLUTAMATE, MALTODEXTRIN, GARLIC, ONION, PARSLEY, SPICE, CARRAGEENAN, CALCIUM STEARATE, PARTIALLY HYDROGENATED CANOLA OIL, BUTTERMILK PRODUCT, TURMERIC (COLOR).

CONTAINS: MILK
Label C

Ingredients: Durum flour & semolina blend, fiber, niacin, iron (ferrous sulfate), thiamin mononitrate, riboflavin, folic acid.

Information: has wheat ingredients and is manufactured in a facility that uses eggs.
Label D
Ingredients: Sunflower Seed, Sugar, Mono-Diglycerides, to prevent separation, Salt, and Natural Mixed Tocopherols to preserve freshness. Made on equipment that processes soybeans. Processed in a peanut and tree nut free facility.
Label E

INGREDIENTS: WATER, DISTILLED VINEGAR, VEGETABLE OIL (SOYBEAN AND/OR CANOLA), CIDER VINEGAR, ROMANO CHEESE (CULTURED MILK, SALT, ENZYMES), SUGAR, GARLIC*, EXTRA VIRGIN OLIVE OIL, CONTAINS LESS THAN 2% OF: OMEGA 3 [FISH OIL AND FISH GELATIN (CONTAINS TILAPIA, SARDINE AND ANCHOVY)], ANCHOVY (FISH), LEMON JUICE CONCENTRATE, SPICE, SALT, FERMENTED WHEAT PROTEIN, YEAST EXTRACT, MALTODEXTRIN, XANTHAN GUM, PROPYLENE GLYCOL ALGINATE, POTASSIUM SORBATE, SODIUM BENZOATE AND CALCIUM DISODIUM EDTA AS PRESERVATIVES. *DRIED.
Label F
BEEF, WATER, TEXTURED SOY PROTEIN, EGGS, DEHYDRATED ONION, GARLIC, SPICES, BREAD CRUMBS, WHEY
ALLERGIES: CONTAINS EGGS, MILK, AND WHEAT
Label Reading Role Play Cards

Instructions: Cut each scenario into individual word strips to give to groups.

1. A child allergic to peanuts was served a soy butter sandwich. Her very upset parent comes to you because the child did not eat lunch since she thought it was a peanut butter sandwich.

2. The cook reviewed a food label and noticed a food allergen that was not normally on the label, and it was not flagged. The food is on the line about to be served.

3. You pull frozen chicken tenders from the freezer, but there is no food label on the bag. All ingredient information was on the box that was recycled.

4. While reading a food label, you notice that the pasta sauce now contains wheat.

5. The substitute cook could not find the label for the USDA Foods meatballs, so he used the USDA Fact Sheet.

6. The person that normally reads the labels is out today and a substituted product has been delivered.
Avoiding Cross-Contact Scenario Cards

Instructions: Cut each scenario into individual word strips to give to groups.

Receiving
• When receiving dry goods, you notice flour all over the back of the truck. The driver explains that a bag broke open. The flour is on everything including the canned goods you just received.

Storing
• The designated food allergen-free shelf has an allergen containing food on it.

Preparing
• The cans of fruit cocktail pulled for lunch are covered in flour.

Cooking
• The pan used to bake fish sticks is used to bake skinless chicken breasts without cleaning in between.

Serving
• While serving food one the line, you realize you have used the fish stick tongs to serve french fries.

Holding
• The remaining burgers are moved to the same pan to place in the hot-holding cabinet between lunches. Burgers containing soy are placed on one side of the pan and soy-free burgers are on the other.